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December 10, 2002

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: ***Ex Parte Presentation***
WC Docket Nos. 02-202, 02-304, 02-317, 02-319 and 02-340.

Dear Ms. Dortch:

On behalf of Sprint Corporation, Richard Juhnke, Michael Fingerhut, Jeb Benedict and I met today with Matthew Brill, Legal Advisor to Commissioner Kathleen Abernathy, to discuss the above-referenced matters.

During the meeting, Sprint reiterated its positions expressed in its previous submissions in these dockets. We argued that it is improper for the Commission to modify or rescind rate prescriptions, such as the security deposit/advance payment provisions prescribed by the Commission in its *1984 Access Tariff Decision*,¹ simply by declaration issued under Section 1.4 of the Commission's Rules. The Commission may not engage in ratemaking without full notice and comment. Further, the local exchange carriers that seek to modify their security deposit and advance payment requirements have not demonstrated the need to change their currently effective tariff provisions and have failed to show that such provisions would not have substantially mitigated any uncollectible issue – to the extent there is one – had such provisions been exercised in a timely manner.

In accordance with FCC rules, this letter is being filed electronically in the dockets identified above.

Sincerely,

cc: Matthew Brill

¹ *Investigation of Access and Divestiture Related Tariffs*, CC Docket No. 83-1145 (Phase I), 97 FCC 2d 1082 (1984).