Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
1998 Biennial Regulatory Review - Streamlined Contributor Reporting Requirements Associated with Administration Of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms	)	CC Docket No. 98-171
	)	
Telecommunications Services for Individuals With Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990	)	CC Docket No. 90-571
	)	
Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size	)	CC Docket No. 92-237 NSD File No. L-00-72
	)	
Number Resource Optimization	)	CC Docket No. 99-200
	)	
Telephone Number Portability	)	CC Docket No. 95-116
	)	
Truth-in-Billing and Billing Format	)	CC Docket No. 98-170

REPLY COMMENTS OF SPRINT CORPORATION

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April 18, 2003

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REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint"), on behalf of its incumbent LEC, competitive LEC/long distance and wireless divisions, hereby submits its Reply Comments on the Report and Order (Order) and Second Further Notice of Proposed Rulemaking in the

above-referenced dockets, 17 FCC Rcd 24952 (2002) (*Second Further Notice*) and the Public Notice, *Commission Seeks Comment on Staff Study Regarding Alternative Contribution Methodologies*, FCC 03-31 (released February 26, 2003) *(Staff Study)*.

I. INTRODUCTION AND SUMMARY

A compelling case has been made that the universal service assessment methodology must be changed to ensure the long-term viability of the fund. Two forces are at work here which are inflating the revenue-based contribution factor: a growing demand for universal service funds and a declining revenue contribution base. In her April 2, 2003 testimony before the United States Senate Committee on Commerce, Science, and Transportation, Subcommittee on Communications, Commissioner Abernathy explained two of the key revenue trends which are decreasing the revenue base and thereby destabilizing the fund:

> While long distance revenues grew between 1984 and 1997, they have since been flat or in decline as a result of price competition and substitution of wireless services and e-mail. Because federal universal service contributions by law may be assessed only on interstate revenues, this shrinking of the revenue base has caused the contribution factor to rise steadily. Another important trend has been the increasing prevalence of bundled service plans. For years, wireless carriers have offered buckets of any-distance minutes at flat rates, and now wireline carriers such as MCI and Verizon are offering packages including local and long distance for a single price. In addition, many carriers offer business customers bundles that include local and long distance voice services, Internet access, and customer premises equipment. Such bundling has been a boon for consumers but has made it difficult to isolate revenues from interstate telecommunications services. And the problem is likely to get worse as bundling becomes more and more popular.

The pressure these trends are placing on universal service revenues, combined with the increasing demand for universal service funds (over $6 billion in 2003), make reform of universal service funding mandatory.[1]

To stabilize universal service funding, the Commission must adopt a new methodology which is equitable, non-discriminatory and broad-based, as well as sustainable with the lowest cost to consumers and carriers.[2] The Commission has identified three different methodologies, all of which it refers to as "connection-based,"[3] which it presents in its *Second Further Notice.* Each of the proposed new methodologies must be evaluated in terms of the impact on consumers and service providers and on its ability to preserve the fund. To this end, the Staff has prepared an extremely comprehensive model that incorporates numerous variables related to the various proposed methodologies and universal service projections and that can be used to

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[1] In its Comments in response to the Notice of Proposed Rulemaking (FCC 03-13) released February 26, 2003, concerning the Joint Board's July 10, 2002 *Recommended Decision,* Sprint recommended that the list of services supported by the universal service fund remain unchanged and that neither equal access nor any other service be added to the list because any additions would increase the fund beyond a sustainable limit.

[2]The Commission must also complete other proceedings which bear on ensuring competitive neutrality across products and which will have a significant impact on the universal service funding base. For example, in the *Broadband Wireline Proceeding*, the Commission is considering whether broadband Internet access services, which compete with DSL, should contribute. *See Comments Sought on Appropriate Framework for Broadband Access to the Internet Over Wireline Facilities: Universal Service Obligations of Broadband Providers,* Notice of Proposed Rulemaking, 17 FCC Rcd 3019 (2002).

[3] In reality, none of the options, as proposed by the Commission, are purely connections-based, and all three proposals are separate and distinct in concept: one is based largely on numbers, one largely on connections, and one on a peculiar mix of connections and revenues.

evaluate alternative proposals and identify the impact of certain assumptions. Sprint has validated the Staff's assumptions and operation of the model by comparing its results with Sprint's own model. The results are comparable, indicating that both models are accurate and reliable for evaluating the reasonableness of the conclusions and the impact of the new methodology on customers and carriers.

Sprint believes that a pure number-based approach is the best method to meet the FCC's goals. Sprint favors a numbers methodology that would apply an equal, non-discriminatory charge to all residential and business customers (excluding Lifeline and Link-Up customers) using telephone numbers, including Public Switched Telephone, toll free, 900 and 500 numbers, and that would not involve a capacity-based assessment on special access and private lines service or a minimum revenue-based contribution. The base of telephone numbers exhibits stable growth that can be expected to continue and will ensure the sustainability of the fund. The approach is simple and easy to understand and will be relatively easy to track and audit. Sprint estimates that it could be implemented by carriers within 6 to 9 months. As a second-best solution, Sprint would support a connection-based approach.

Opponents of the number-based and connection-based approaches argue that they do not meet the requirement for "every" carrier to make "equitable and nondiscriminatory" contributions and apply a contribution requirement on intrastate services. Sprint disagrees. As Sprint has discussed in its previous filings in these dockets, which it incorporates by reference here, Section 254(d) does not require that all carriers providing interstate service contribute to the USF, as evidenced by the fact that

currently not all carriers contribute (*e.g.*, purely wholesale carriers and international carriers are excluded). Because every carrier will be assessed based on its end user numbers or connections, these methodologies are "equitable" to all carriers and do not discriminate among them. Further, a customer's number or connection provides access to the public switched network for the placement of local, intrastate, interstate and international calls; a per-number or per-connection charge is assessed based on each end user's use of numbers or connections to originate and terminate interstate and international calls. Thus, contrary to the assertions of some commenting parties, the Commission is not assessing universal service fees on intrastate revenues or regulating intrastate service.

In the discussion below, Sprint elaborates on the reasons why the number-based methodology, as modified by Sprint, should be adopted to ensure a sustainable universal service fund and on the impact the new contribution method will have on customers. Sprint will discuss the serious deficiencies with the SBC/BellSouth proposal, including the recent modifications SBC and BellSouth have proposed. Finally, Sprint opposes continued use of the interim revenue-based proposal and urges the Commission to immediately adopt a connection-based system.

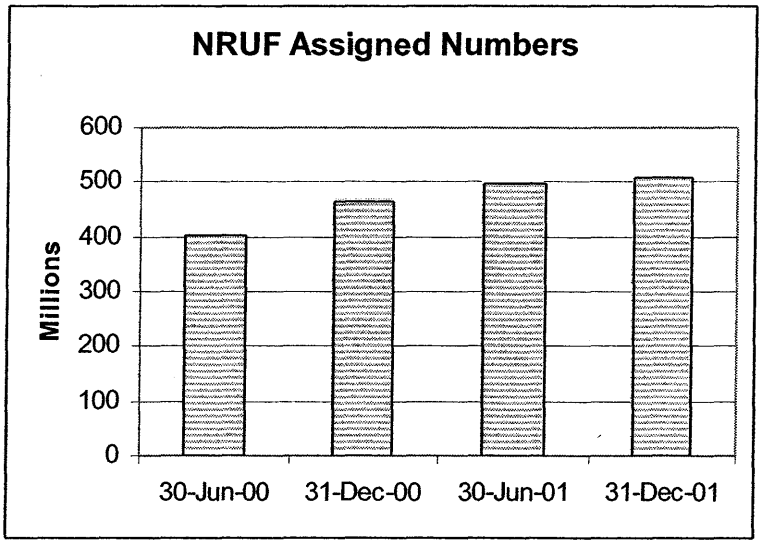
II. THE NUMBER-BASED PROPOSAL BEST MEETS THE FCC'S GOALS

Sprint supports a number-based methodology because it will ensure the sustainability of universal service funding, because it is easy to understand and implement, and because assessments will be collected in a competitively neutral manner from a broad range of interstate service providers: LECs, CLECs (including cable

companies providing cable telephony), IXCs, CMRS providers and paging companies.[4] Under Sprint's version of this methodology, all providers of interstate telecommunications services would be assessed an equal fee based on the number of working telephone numbers, including toll free, 900 and 500 numbers, that are assigned to their end user customers. As discussed below, this approach has numerous benefits and will have a reasonable impact on customers.

A. The Number-Based Proposal Is Superior To Other Methodologies

A number-based assessment methodology has many benefits over the alternative methodologies. In particular, based on recent experience shown below, it is reasonable to assume that numbers will exhibit steady growth in the future.[5]



[4] Other parties supporting the number-based approach include AT&T, Ad Hoc and the Michigan Public Service Commission.

[5] For detailed information, see Attachment I.

Both the *Staff Study* and the Sprint model assume that numbers will continue to grow over the planning horizon. The steady growth of numbers and the broad range of services that will be assessed will ensure the sustainability of the fund. In this regard, the *Staff Study* projects universal service funding to grow by 3.6 percent annually, and the base of numbers to grow by an average of 2.5 percent per year. Thus, the unit assessment on numbers would grow very slightly, roughly an average of 1.1 percent annually. In addition, it is the simplest of the proposed methodologies, and therefore the one which will be most easily understood by customers. Customers can readily identify the numbers "assigned" to them, and customers will be able to verify easily whether or not their monthly assessment is accurate based on how many numbers they have and the applicable per-number contribution amount.[6]

Telephone numbers have been categorized and defined by the Commission (*see*, 47 CFR § 52.15) and an organization, NRUF, collects information concerning them on a semiannual basis. In order to ensure that all carriers are reporting their numbers properly, the carriers' projections can be verified by comparing the carriers' projected numbers with the numbers they report to the North American Numbering Plan Administrator (NANPA), in their Numbering Resource Utilization and Forecast (NRUF) filing. If a significant discrepancy is identified, USAC can request justification for the differential. This ability to cross-check carriers' reported numbers serve as a strong deterrent to

[6] Sprint agrees with AT&T (at 7) that the assessment must be based on the carrier's projected quarterly numbers, and, in this respect, would be similar to the projection of revenues which the Commission recently adopted. Carriers would project their numbers on a quarterly basis.

carriers who might otherwise underreport their numbers in an effort to avoid contributing their fair share into the fund.

No comparable validation is available for the connections-based or revenue-based methodologies. There is no existing organization which monitors the number of connections; and, in order to verify the number of connections a carrier might report, an audit would have to be conducted. Even then, it would be difficult to establish the validity of the number of connections without information from outside sources. For example, the number and capacity of connections used to provide Centrex service might have to be checked against the bills from the underlying facilities provider under the connections-based methodology. Such verification would be extremely time-consuming and expensive. And revenue-based methodologies involve necessarily arbitrary allocations of revenues from bundled offerings to interstate/international services, an increasing problem as such bundles proliferate and the range of products they encompass expands.

The number-based methodology is also adaptable to changes in technology, because any such change is unlikely to eliminate the need for a number to reach the called party using the Public Switched Telephone Network (PSTN). For example, VoIP is a new, growing Internet-based service whose users will need numbers in order to receive calls from other users of the PSTN. Under the numbers methodology, a standard assessment would be applied to any technology that requires numbers, even if the service is considered "enhanced." Thus, the categorization of new services as enhanced or basic

will not affect the sustainability of the fund; the base can continue to expand and evolve because the basis is the numbers which such services require.

Finally, if all competitive services are required to apply the same assessment per number, there will be no competitive advantage or disadvantage based on the technology used (*e.g.*, wireless versus wireline, or traditional switched versus VoIP). Competitive neutrality across services is extremely important to ensure that one service is not unfairly disadvantaged because it is required to contribute when a competing service is not. In this regard, under the present rules, VoIP services are not included in the contribution base, giving carriers a powerful incentive -- a 9.1 percent cost saving -- to employ VoIP in lieu of other technologies, and thereby jeopardizing the sustainability of the USF programs.

B. Sprint Disagrees With Certain Aspects Of The Commission's Number-Based Proposal

The Commission's number-based proposal would impose a minimum revenue-based contribution on carriers, would apply a contribution based on capacity to certain services, and would reduce the assessment on the numbers for certain services. Sprint believes that these non-number-based components render the Commission's methodology unduly complex, inequitable and not competitively neutral.

1. Minimum Payment Based on a Percentage of Revenues

As Sprint discussed in its Comments (p. 18), a minimum payment based on a percentage of revenues should not be required with any number- or connection-based

methodology.[7] The Commission, however, includes such a minimum payment requirement, presumably in order to ensure that a connection-based method is consistent with the requirement of Section 254(d) that "every" telecommunications carrier contribute to the fund, an issue about which the Commission has requested comments. *Second Further Notice,* ¶72. As noted above, and discussed previously in this docket, Sprint does not believe a pure number-based approach violates § 254(d). Moreover, there are many flaws with a revenue-based minimum contribution. For example, there is no way to develop a minimum payment that will be equitable to the carriers obligated to pay it. Sprint believes it would be impossible to develop a percentage-based rate for some carriers that would be equivalent to a flat, connection-based rate applied to others.[8] Sprint agrees with Consumers Union, *et al.,* (pp. 14-15) that there is no way to evaluate whether a selected revenue-based contribution percentage is equitable when compared to the connection-based contribution of other carriers. The lack of equivalency between the methodologies will produce competitive distortions which will affect customers' purchasing decisions. Thus, the minimum payment will have a serious anticompetitive effect on carriers forced to pay it.

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[7] In its Comments (p. 9), Sprint stated that it "would not oppose a fixed contribution, not based on revenues, which all carriers providing interstate services must make to the USF irrespective of whether they collect a connection charge for their end users," because this would treat all carriers equally.

[8] WorldCom suggests that certain "guideline principles" that the Commission should follow if it determines that a minimum contribution is in the public interest (p. 33). Sprint does not believe that the principles of equitable and non-discriminatory treatment can be achieved using two different contribution methodologies.

In addition, a minimum payment based on revenues would continue the need for revenue-based reporting which, as Commissioner Abernathy has discussed, will become increasingly difficult as bundles become more prevalent. As she noted, bundles that customers obtain for a flat monthly charge may include local, long distance and mobile service, as well as non-regulated local features, Internet services and customer premises equipment. As bundling services increases, the problem of identifying interstate revenues worsens.[9]

Finally, the Commission suggests applying the minimum contribution to interstate revenues, but offers no explanation as to why it would not exclude wholesale services (*Second Further Notice,* ¶ 79), thereby double-counting revenues. Resellers would be placed at a competitive disadvantage because they would be required to contribute to the fund based on the wholesale carrier's charges and then a second time based on their charges to their customers. This double-counting was rejected in the *Universal Service Order*[10] and should not be permitted to reappear in a minimum payment calculation.[11] For these reasons, Sprint removed the minimum contribution obligation when it used the *Staff Study* model to assess the number-based and connection-based methodologies.

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[9] Verizon suggests an examination of the feasibility of "safe harbor" for bundles (p. 4). A "safe harbor" for all the variations of services bundled into the offerings is simply impractical given the wide array of products, services and discounts included in bundled offerings. Similarly, NASUCA's proposed 25 percent allocation (pp. 6-7) is unjustified given the disparate bundles that are being offered.

[10] *Federal –State Joint Board on Universal Service,* CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, 9206-07 (1997).

[11] *See, also,* Comments of TracFone Wireless, Inc. at 21 and Verizon at 10.

2. Capacity-Based Assessments On Special Access and Private Line Services

Sprint opposes the application of an assessment on special access and private line services in a number-based plan. Most users of such facilities employ them together with services that have telephone numbers associated with them, and there is no need for extra assessments for users of such services. As discussed in Sprint's initial comments, a pure number-based approach is fair, simple and understandable; and, as discussed above, it avoids the problem of verifying and auditing the number and size of capacity-based connections that would be necessitated by combining the number-based approach with special capacity-based charges for special access and private lines. Sprint also believes that there is a potential for the capacity-based tiers and their associated assessment to skew the pricing of facilities and, consequently, a business customer's purchase decision. The assessment for universal service should not have this type of effect on customer's selection of facilities.[12]

If the methodology the Commission adopts nonetheless includes an assessment on these services, Sprint urges the Commission to assess them based on the three-tier CoSUS structure, which Sprint supported over the four-tier approach in its Comments (pp. 11-12) because it believes this structure would produce less distortion on the customer's purchasing decision. However, the most administratively efficient and equitable result is to not assess special access and private line circuits at all.

[12] *See*, Comments of Ad Hoc at 11, NRTA/OPATACO at 10-11, and Fred Williamson and Associates, Inc. (FW&A) at 14.

3. Reduced Assessments For Certain Services

Sprint believes that all numbers should be assessed the same charge. No differentiation should be made for pagers, facsimiles, prepaid wireless providers, or thousand block pooling. Therefore, the revenue from numbers associated with facsimiles should be raised from the *Staff Study*'s $0.01 level to a full assessment, and numbers associated with pagers should also receive a full assessment.[13] There is likewise no longer a justification for an equivalency ratio for Centrex customers if PBX customers are charged on a per number basis just as Centrex customers are charged.

C. Customers Will Not Be Adversely Impacted By The Number-Based Methodology

Sprint modified the *Staff Study* to estimate the factors and revenues generated by its pure numbers proposal.[14] The per-number assessment for all types of numbers is $1.04. This is only five cents higher than the *Staff Study* assessment for the number-based proposal described in the *Second Further Notice.* The average 2004 assessment on households is approximately the same as well: $2.54 versus $2.52. Consistent with Sprint's pure numbers proposal, no revenue is attributed to "Minimum contributions from non-de minimis carriers" or to T1, DS3 and OC3 interstate private lines.

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[13] Sprint disagrees with Arch Wireless Operating Company, Inc.'s argument that capacity should be based on spectrum used (pp. 6-8) because Sprint believes that the customers of paging services have a potential benefit from a telephone number that is equal to that of other users.

[14] *See* Attachment II for the output of the model using Sprint's pure number-based methodology for 2004. The 2004 results are an average of the four quarters produced by the model.

Although the projected average assessment per household for 2004 using Sprint's pure numbers proposal is slightly higher than the 2003 household assessment under the revenue-based methodology,[15] the burden on customers who place few or no interstate calls and have just one connection or number will increase by only $0.50. This amount, which is the difference between the application of the current 9.1 percent contribution factor to a $6.00 primary line subscriber line charge, $0.54, and the pure number-based rate of $1.04, represents approximately 2 percent of an average flat-rated bill for local service of $21.84.[16] If Lifeline and Link-Up customers are exempt from the contribution, those who are least able to pay will not experience this increase. Thus, the impact on customers with low volumes of interstate calling will be reasonable.

III. THE CONNECTION-BASED APPROACH IS THE NEXT BEST ALTERNATIVE PROPOSAL

If the Commission were to decide against a number-based approach, then Sprint would urge it to adopt a connection-based approach. Sprint does not object to establishing the initial per-connection charge for residential, single-line business, payphone and mobile wireless services at $1.00 and attributing the residual costs to multi-line business customers. However, there is no justification for burdening large business customers with all future fund increases, and indeed such approach will drive them to seek alternatives which are not subject to a universal service assessment. Further, there will be no incentive to curb the growth of the fund if all residual costs are absorbed by

[15] The 2003 average monthly assessment estimated by the *Staff Study* is $2.24.

[16] Source: FCC Report: Reference Book of Rates, Price Indices, and Household Expenditures for Telephone Service July 2002, Table 1.1.

multi-line business customers. Therefore, if the Commission decides to adopt this methodology, the relationship among per-connection charges should remain constant over time, so that no single class of customer has to bear all the costs of possible future increases in the fund size (or decreases in the number of connections). For that matter, if the unit costs decrease, the Commission may wish to consider applying all such decreases to the multi-line business and high-capacity assessments, so as to bring them in closer relationship with residential and single-line business assessments.

Sprint analyzed the connection-based proposal by modifying the assumptions consistent with its modifications to the Commission's numbers proposal. Specifically, Sprint eliminated the minimum payment and established the rate for one-way and two-way pagers at the base rate. With these modifications, the base charge for multi-line business would be $3.14,[17] versus the rate of $2.62 in the Staff Study Proposal 1, Connection-Based Methodology.

IV. THE SBC/BELLSOUTH PROPOSAL PERPETUATES THE PROBLEMS OF THE REVENUE-BASED SYSTEM

Supporters of the SBC/BellSouth proposal claim that this is the only alternative which complies with Section 254.[18] This is simply not the case. As discussed above and in Sprint's Comments, either the connection or the telephone number methodology would fully comply with the Act. Therefore, there is no reason to continue with a

[17] *See* Attachment III.

[18] *See* Comments of NRTA/OPATACO at 5-7 and USTA at 6.

revenue-based approach – even for only a portion of the carriers contributing into the fund – and retain all of its flaws.

SBC/BellSouth state (Comments, p. 3) that they modified their proposal to assess "all providers of stand-alone switched long distance services and occasional use services" a revenue-based charge based on a residual revenue requirement. This approach is blatantly anticompetitive because the revenue-based contribution factor will not equal the rate which it and other providers of local service will charge when they provide both local and long distance service. This modification clearly fails the "equitable and non-discriminatory" requirements of the Act.

Also anticompetitive is SBC/BellSouth's proposal to assess interstate private line services, special access connections and broadband services a full end user connection charge "even if the end user has a separate retail relationship for the interstate transport component of the service." (*Id.*, p. 9) SBC/BellSouth allege that this rule is reasonable because generally the provider of the non-switched connection also provides the transport as well. Customers who do not take both services from a single provider will obviously be penalized: they will pay the full connection charge to the local service provider and an additional amount to the transport provider. Because they will incur a greater universal service pass-through charge than those who use a single provider, they will have a clear disincentive to using multiple carriers.

The application of universal service assessments by multiple carriers eliminates one of the primary benefits of a number- or connection-based approach, that is, the collection of the fee by a single service provider that is currently billing the customer and

that has complete information concerning the customer's local service. If the second carrier must obtain information about the customer to determine the assessment, as well as to bill and collect the fee, significant additional costs will be incurred. These costs will ultimately be borne by the customer.

The application of charges by multiple carriers under this proposal will be extremely confusing to customers. The confusion associated with multiple carriers billing and collecting a universal service assessment using different methods will inure to the benefit of the local exchange carrier that provides a combination of local and long distance services. This increased level of customer confusion will, most certainly, result in additional inquiries and complaints to the various state PUCs and the Commission.

Thus, the Commission should not adopt this alternative proposal which is discriminatory against IXCs that provide transport services only and will result in higher costs than the other connection-based proposal for collecting universal service fees.

V. THE COMMISSION SHOULD NOT POSTPONE IMPLEMENTATION OF A CONNECTION-BASED METHODOLOGY

Many parties advocate that the Commission retain the revenue-based methodology or defer any change in the methodology until the effectiveness of the interim changes can be assessed.[19] They believe that the changes adopted by the Commission will remedy many of the problems with the revenue-based methodology. Sprint strongly disagrees. It would be extremely shortsighted of the Commission to find

[19] *See*, Comments of Consumers Union, *et al.* at 3, FW&A at 4, NASUCA at 4, National Indian Education Association at 2, TracFone Wireless at 5-12, Verizon Wireless at 3 and WebLinkWireless Inc. at 8-9.

that the interim solution will resolve the fundamental shortcomings of a contribution methodology based on revenues, which were reviewed by the Commission (¶ 3) and discussed above. There will be continued deterioration of the revenue base as bundled offerings become more prevalent which typically reduce the price of long distance service[20] and as new alternatives are developed, such as VoIP, which are not subject to the universal service contribution requirements. A dramatic example is the telecommunications revenues reported by prepaid card providers. Their Form 499 submissions show a decline in such revenues, in a fast-growing market, of more than 90 percent in just three years, from $866 million in 1999 to only $72 million in 2002 (preliminary data).[21]

On the other hand, the size of the fund shows no sign of decreasing. Rather, the growth rate of the funding requirements is increasing, as more entities seek to obtain universal service support.[22] Thus, the contribution factor can be expected to rise from its initial high level of 9.1 percent.

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[20] Currently, long distance service is being heavily discounted or given away for free in order to attract customers. For example, in selected states, SBC is offering a bundle of services for $52.95 per month, which includes "unlimited nationwide SBC long distance domestic direct-dial calling from home" and "unlimited local calling plus our most popular calling features." *See*, http://www01.sbc.com/Products_Services/Residential/ProdInfo_1/1,,1126--4-3-12,00.html SBC is advertising that it will waive the long distance charges for six months, a $90 value.

[21] FCC, "Telecommunications Industry Revenues – 2001," March 2003, Table 3.

[22] Evidence of the increasing demand for universal service support is the efforts of the Republic of Palau, which has entered into a Compact of Free Association with the U.S., to become the first foreign nation to obtain universal service funding for its rural telephone company.

A shift to either a number-based or a connection-based methodology will necessarily require some time to implement. Therefore, the Commission must continue to evaluate alternatives and to adopt a non-revenue-based methodology as soon as possible.

VI. CONCLUSION

Sprint's evaluation of the alternatives to the current revenue-based methodology is based on its provision of a combination of local, long distance and CMRS services, all of which contribute significant sums to the universal service fund. Given this unique perspective, Sprint believes that either the per-connection USF recovery mechanism based on telephone numbers, or alternatively, one based on end-user connections, will provide the most equitable, non-discriminatory approach to ensure the sustainability of the universal service fund in the future. Given the severe pressures on the fund, Sprint urges the Commission to adopt a new approach.

Respectfully submitted,

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April 18, 2003

ATTACHMENT I

NRUF ASSIGNED NUMBERS

NRUF Assigned Numbers

	30-Jun-00	31-Dec-00	30-Jun-01	31-Dec-01
LEC	287,453	303,336	305,938	305,430
CLEC	13,261	24,799	27,942	30,941
Wireless	52,645	99,019	111,734	128,493
Paging	25,822	13,042	23,621	18,001
Others	569	181	-	-
500			2,812	1,989
900			115	168
Toll Free	22,360	22,925	24,536	24,481
Total	402,110	463,302	496,698	509,503

Source: All numbers are from the FCC's Numbering Resource Utilization in the United States report,Tables 1 and 9, except Toll Free numbers which are from the FCC's Telecommunications Trends in Telephone Service report, Table 19.2.

ATTACHMENT II

SPRINT PURE NUMBERS PROPOSAL

SPRINT
PURE NUMBERS PROPOSAL

	2004 Average USFSTUD6
PROJECTED ASSESSMENTS UNDER NEW Number-based CONTRIBUTION METHODOLOGY	
Projected revenue-based factor	0.0963
Collections on a revenue basis	
Projected connection-based factors	
Assessment for residential, single-line business, mobile wireless and payphone connections	$1.04
Base charge for multi-line business connections	$1.04
Fund requirement ($ Millions)	
Target collections	$6,624
USF program requirements	$6,624
Minimum contributions from non-de minimis carriers	$0
Adjustments to reserve fund	$0
Total numbers in assessment base	534.6
Share of contributions by industry segment	
IXC	5%
LEC	62%
Wireless	34%
Assessments on households	
Average monthly pass-through charge per household	
Obligation to carriers per household	$2.54
Markup in pass-through charges	
Sample contributions per month	
IXC contribution per household	$0.12
Wireless contribution per handset	$1.04
LEC contribution per primary residential phone	$1.04
Percentage of fund met from residential assessments	48%
Assessments on selected business services	
Sample contributions per month	
Centrex connection	$1.04
One-way pagers	$1.04
Two-way pagers	$1.04
Single-line business connection	$1.04
Centrex connection	$1.04
T1 configured as 20 exchange service trunks	
Single main number supporting 100 extensions	$1.04
Configured as 100 direct inward dial phones	$104.02
T1 interstate private line priced at $700 per month	$0.00
DS3 interstate private line priced at $7,000 per month	$0.00
OC3 interstate private line priced at $17,500 per month	$0.00
Percentage of fund met from business assessments	

SPRINT
PURE NUMBERS PROPOSAL

	2004 Average USFSTUD6
KEY SPECIFICATIONS:	
1 month reserve with initial reserve collected in 2003	
Growth factor reset after 2 years	
Reported line counts vary around trend projections based on a standard deviation of 34000.0%	
KEY QUANTITIES:	
Households with telephone service (millions)	105.6
Selected connections (millions of units except as noted)	
Switched wireline connections	
Residential primary lines (excluding Lifeline)	98.4
Residential non-primary lines	13.9
Wireline units per household subject to assessment	
Percent wireline residential presubscribed to an IXC	1.0
if IXCs are assessed for presubscribed lines	
Single-line business	5.4
Centrex extensions (excluding sold as T1 or greater)	15.7
Reported multi-line trunks	33.7
Local exchange provided as T1/ISDN PRI service	0.4
(in voice-grade equivalents)	7.6
Local exchange provided as DS3 service	-
(in voice-grade equivalents)	2.6
Percent trunks served by T1 & DS3 presubscribed to an I	0.8
if IXCs are assessed for presubscribed lines	
CMRS connections	
Wireless telephony subscribers	158.7
Prepaid	5.4
Other residential	101.0
Residential wireless connections per household	1.0
Non-residential	52.4
One-way paging	13.1
Two-way paging	1.9
Special access and private lines	
Provided as T1 or other Tier 2 capacities	8.7
Provided as DS3 or other Tier 3 & 4 capacities	0.3
Total residential wireline and mobile wireless connections	226.1
Total connections per household	2.1
Selected projections of active telephone numbers	
Residential wireline service	123.9
Business local exchange service	195.9
Wireless Telephony Numbers	163.7
Paging	15.0
Subscriber toll free & 900 service	25.4
Imputed numbers for special access & private line	-
Fax-to-PC & similar arrangements	12.1
Assessment bases before deductions for uncollectibles	
Cosus-type plan	
Total flat-rated connections	343.8
Total capacity units to be assessed at capacity-based rates	-
SBC/Bell South Type-plan	
Total capacity units to be assessed for access	-
Total capacity units to be assessed for transport	-
ADSL lines	7.5
Per household	
Local exchange and wireless services	2.2
Personal 800, personal fax numbers	0.2
ADSL (number equivalents based on Tiers)	-

SPRINT
PURE NUMBERS PROPOSAL

Note: Alternative Plans are located in OPTIONS. In Lotus, use the macro to retrive. Otherwise, cut and paste.

Plan				
Revenue-based contributions				
Potential new USF funding requirements		$0		
Allowance for uncollectibles	Revenue-based	5.00%	18.68	
	Connection/Numbers	0.00%	18.48	
Target Reserve (Percentage of quarterly requirement)		0.00%	17.22	
Percent additional requirement to add each quarter		66.67%	72.50667	
Percent excess reserve to return in current quarter		50.00%		
Division of reserve in Mixed Assessment Plan		1	[0 = revenue side; 1 = connection side; 2= shared]	
Percent of initial reserve to capture in 2003		80%		
# Quarters in 2003 to spread reserve over		4		
Number of Lag quarters for revenue assessments		0	[0 = projected or as billed, 2= current system]	
Number of Lag quarters for connection assessments		0	[0 = projected or as billed, 2= current system]	
Revenue Based Plans				
Percentage of wireless revenues reported as interstate [10/02 for April 2003 base]		28.50%		
Cellphone with bundled enhanced subject		1	[0 = no; 1 = yes]	
new rules to apply safe harbor to Gross vs unbundled		0	[0 = no (status quo); 1 = yes]	
Require that service providers contribute based on Cable modem service [10/02 for April 2003 base]		0	[1= yes; 0 = no]	
Require that carriers contribute on aDSL and other primarily residential dedicated internet access lines		0	[1= yes; 0 = "status quo"; -1 = out]	
Contribute 1% of gross IX revenue as a minimum?		0	[1= yes; 0 = no]	
Classify IP toll telephone service as an interstate telecommunications service		0	[1= yes; 0 = no]	
Prohibit Markups		1	[1= yes; 0 = no]	
Mixed Plans				
Percentage of fund attributed to connections		1	[0 = based on initial specs; 1 = constant percentage of fund determined by initial specs]	
Handling of credits for prior contributions		1	[0 = credit for all contributions two months prior; 1 = credit associated with "residual" services]	
Connection Based Plans				
Require filers to contribute based on interstate end-user revenues of services that are not assessed on a connection basis.		0	[1 = yes]	
International circuits included		0	[1 = yes]	
Asymmetrical Services measured by		1	[1 = lower speed; 0 = avg. speed]	
Bill IXCs for half of LEC assessment if there is A presubscription arrangement		0		
ISP direct contributor See notes in workpaper 12		0	[1 = yes]	
Temporarily increase fixed charges per line to allow for reserve. (Amount = target reserve percentage spread over first two quarters as specified)		1	[1 = yes]	

Calculation of contribution units based on capacity

1 Kbps 64 Kbps	VG	0		1	1
65 Kbps 284 Kbps	BRI	0		1	1
285 Kbps 1.038 Mbps		0		1	1
1.039 Mbp 1.543 Mbps		0		16	1
1.544 Mbp 4.940 Mbps	T1	0		16	5
4.941 Mbp 32.500 Mbps	ADSL > 6 meg	0		16	5
32.510 Mt 44.990 Mbps		0		224	5
45.000 Mt 95.420 Mbps	DS3	0		224	5
95.430 Mt 362.200 Mbps	OC3	0		336	40
362.210 M 1.448 Gbps	OC12	0		336	40
1.449 Gbp 5.794 Gbps	OC48	0		336	40
5.795 Gbp 20.000 Gbps	OC196	0		336	40
		0			

Initial Scalar for Fixed Rate Access Units 1
This could be recalculated quarterly

Assess ACCESS connections:	Fixed Rate	Based on capacity (scaled)
Lifeline customers	$0.00	0
Residential customers served via IP telephony	$0.00	0
Other residential local exchange customers	$1.00	0
Cable DSL	$0.00	0
Other fast internet/DSL	$0.00	0
Additional charge if above 1.09 Mbps	$0.00	
Dial up internet service	$0.00	0

SPRINT
PURE NUMBERS PROPOSAL

Prepaid wireless telephony	$1.00	0	
Enhanced wireless telephony	$1.00	0	
Other wireless telephony	$1.00	0	
One-way pagers	$1.00	0	
Two-way/advanced pagers	$1.00	0	
Single line business (SLB) lines	$1.00	0	
Payphone	$1.00	0	
ISDN BRI	$1.00	0	
Centrex connections provided as trunks	$1.00	0	
Centrex connections provided as T1 lines	$1.00	0	
Business exchange access served via IP telephony	$0.00	0	
Business Trunks	$1.00	0	
Business exchange access via T1, ISDN PRI & DS3)	$1.00	0	
All business exchange lines treated as single lines	$0.00	0	[if this is 1, then Business Trunks & T1s should be]
Price per fax at home number (number plan only)	$1.00		
Special access & private lines	subject	Count	
connecting customers to IXCs for ordinary toll (800)	0	1	
Connecting customers to ISPs	0	1	
Connecting customer locations in same exchange	0	0	
Connecting customer locations in different cities *	0	1	
Sold to CLEC for resale as local exchange	0	0	
Used in IXC networks	0	0	
Used for Internet transmission (ISP/IT)	0	1	
Special Access if subject	Charge if subject		
Trunk	$1.00		
T1	$1.00		
DS3	$1.00		
OC3	$1.00		
OC12	$1.00		
OC48	$1.00		
OC198	$1.00		
Price per Caller Toll-Free Number	$1.00		
* other than circuits used by ISPs & internet network companies			
Number of quarters before reinitializing fixed charges	4		

Initial Scalar for Fixed Rate Access Units	1

Assess transmission connections	Fixed Rate	Based on capacity (scaled)	
Lifeline customers	$0.00	0	
Residential customers served via IP telephony	$0.00	0	
Other residential local exchange customers	$0.00	0	
Cable DSL	$0.00	0	
Other fast internet/DSL	$0.00	0	
Additional charge if above 1.09 Mbps	$0.00		
Dial up internet service	$0.00	0	
Prepaid wireless telephony	$0.00	0	
Enhanced wireless telephony	$0.00	0	
Other wireless telephony	$0.00	0	
One-way pagers	$0.00	0	
Two-way/advanced pagers	$0.00	0	
Single line business (SLB) lines	$0.00	0	
Payphone	$0.00	0	
ISDN BRI	$0.00	0	
Centrex connections provided as trunks	$0.00	0	
Centrex connections provided as T1 lines	$0.00	0	
Business exchange access served via IP telephony	$0.00	0	
Business Trunks	$0.00	0	
Business exchange access via T1, ISDN PRI & DS3)	$0.00	0	
Special access & private lines	subject		
connecting customers to IXCs for switched	0	0	
Connecting customers to ISPs	0	0	
Connecting customer locations in same exchange	0	0	
Connecting customer locations in different cities **	0	0	
CLEC for resale as local exchange	0	0	
Used in IXC networks	0	0	
Used for Internet transmission (ISP,	0	0	
Special Access if subject			
Trunk	$1.00		
T1	$1.00		
DS3	$1.00		
OC3	$1.00		
OC12	$1.00		
OC48	$1.00		
OC198	$1.00		
Include customers with no toll bill in month			
wireline residential & single line business		1	[1 = include]
other wireline customers		1	[1 = include]
wireless telephony customers		1	[1 = include]

SPRINT
PURE NUMBERS PROPOSAL

Include Wireless if toll provided by IT	1	[1 = include]
** And even include lines that are not interconnected with the PSTN or Internet	1	[1 = include]
For measuring transport, use same capacity as access	1	[0=use activated trunks]
Monti Carlo Parameters		
STD of month to month variation in connections	0	
Months of data to use for regression (if Macro is set)	5	
Use downturn scenario	0	

ATTACHMENT III

SPRINT 3-TIER CONNECTIONS PROPOSAL

SPRINT
3-TIER CONNECTIONS PROPOSAL

	2004 Average USFSTUD5
PROJECTED ASSESSMENTS UNDER NEW Connection-based Methodology	
Projected revenue-based factor	0.09615
Collections on a revenue basis	0
Projected connection-based factors	
Assessment for residential, single-line business, mobile wireless and payphone connections	$1.00
Base charge for multi-line business connections	$3.14
Fund requirement ($ Millions)	
Target collections	$6,592
USF program requirements	$6,624
Minimum contributions from non-de minimis carriers	$0
Adjustments to reserve fund	($30)
Expected collections based on initial period assessment rates and forecast units (used to calculate growth factor)	
Calculation of base charge for multi-line business connections	
Expected collections from residential, single-line business, mobile wireless, payphone and pager connections	$3,431
Percentage of funding requirement	52.05%
Capacity units used for calculating base rate (forecast based on connections reported in prior months)	$83
Share of contributions by industry segment	
IXC	5%
LEC	49%
Wireless	34%
Assessments on households	
Average monthly pass-through charge per household	
Obligation to carriers per household	$3.01
Markup in pass-through charges	
Sample contributions per month	
IXC contribution per household with one presubscribed line	$0.00
Wireless contribution per handset	$1.00
LEC contribution per primary residential phone	$1.00
Percentage of fund met from residential assessments	59%
Assessments on selected business services	
Sample contributions per month	
Business wireless telephony handset	$1.00
One-way pagers	$1.00
Two-way pagers	$1.00
Single-line business connection	$1.00
Centrex connection	$0.35
Presubscribed Multi-line business trunk	$3.14
No-PIC Multi-line business trunk	$3.14
20 exchange service trunks provided via a T1	$62.88
T1 configured as 20 presubscribed exchange service trunks	$15.72
T1 configured as 20 no-pic exchange service trunks	$15.72
ISDN PRI configured as 20 no-pic exchange service trunks	$15.72
T1 interstate private line priced at $700 per month	$15.72
DS3 interstate private line priced at $7,000 per month	$15.72
OC3 interstate private line priced at $17,500 per month	$125.76

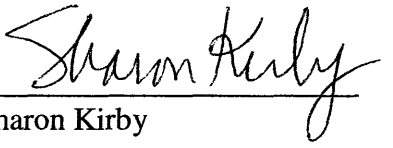
SPRINT
3-TIER CONNECTIONS PROPOSAL

KEY SPECIFICATIONS:
- 1 month reserve with initial reserve collected in 2003
- Growth factor reset after 2 years
- Reported line counts vary around trend projections based on a standard deviation of 34000.0%

KEY QUANTITIES:	
Households with telephone service (millions)	105.625
Selected connections (millions of units except as noted)	
Switched wireline connections	
Residential primary lines (excluding Lifeline)	98.4
Residential non-primary lines	13.925
Wireline units per household subject to assessment	
Percent wireline residential presubscribed to an IXC if IXCs are assessed for presubscribed lines	1
Single-line business	5.4
Centrex extensions (excluding sold as T1 or greater)	15.7
Reported multi-line trunks	33.7
Local exchange provided as T1/ISDN PRI service	0.4
(in voice-grade equivalents)	7.55
Local exchange provided as DS3 service	0
(in voice-grade equivalents)	2.575
Percent trunks served by T1 & DS3 presubscribed to an I	0.775
if IXCs are assessed for presubscribed lines	
CMRS connections	
Wireless telephony subscribers	158.675
Prepaid	5.35
Other residential	100.975
Residential wireless connections per household	1.0075
Non-residential	52.375
One-way paging	13.1
Two-way paging	1.9
Special access and private lines	
Provided as T1 or other Tier 2 capacities	3.7
Provided as DS3 or other Tier 3 & 4 capacities	0.3
Total residential wireline and mobile wireless connections	226.1
Total connections per household	2.125
Selected projections of active telephone numbers	
Residential wireline service	123.9
Business local exchange service	195.85
Wireless Telephony Numbers	163.725
Paging	15.025
Subscriber toll free & 900 service	25.375
Imputed numbers for special access & private line	8.45
Fax-to-PC & similar arrangements	12.05
Assessment bases before deductions for uncollectibles	
Cosus-type plan	
Total flat-rated connections	292.75
Total capacity units to be assessed at capacity-based rates	83.725
SBC/Bell South Type-plan	
Total capacity units to be assessed for access	83.725
Total capacity units to be assessed for transport	0
ADSL lines	7.5
Per household	
Local exchange and wireless services	2.21
Personal 800, personal fax numbers	0.23
ADSL (number equivalents based on Tiers)	0

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply Comments of Sprint Corporation in CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116 and 98-170 was delivered by electronic mail or U.S. First Class Mail, postage prepaid, on this 18th day of April 2003 to the parties listed below.



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