

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
July 3, 2001	)	
2001 Annual Access Tariff Filings	)	CCB/CPD 01-08
	)	
Sprint Local Telephone Companies	)	Transmittal #153

**OPPOSITION OF SPRINT CORPORATION TO AT&T's  
PETITION TO SUSPEND AND INVESTIGATE**

Sprint Corporation ("Sprint"), on behalf of its local exchange carriers, submits its Opposition to AT&T's Petition to Suspend and Investigate Sprint's 2001 annual access tariff filing.

In Part V of AT&T's Petition to Suspend and Investigate ("Petition"), AT&T argues that LECs have understated average transport rates because they have not factored down transport minutes of use to reflect meet-point arrangements where more than one LEC is involved in connecting an end user to an IXC POP.<sup>1</sup> AT&T raised the very same issue in the 2000 Annual Access Filing docket to no avail.<sup>2</sup> In its orders approving the tariff filings, the Commission did not require any LEC to adopt the methodology proposed by AT&T.<sup>3</sup>

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<sup>1</sup> Petition of AT&T Corp (filed June 25, 2001) at 20-24.

<sup>2</sup> See *2000 Annual Access Tariff Filings*, CC Docket No. 00-122, AT&T Petition (filed June 22, 2000) at 10-13.

<sup>3</sup> *2000 Annual Access Tariff Filings*, CC Docket No. 00-122, Memorandum Opinion and Order, DA 00-1487 (rel. June 30, 2000) and Memorandum Opinion and Order on Reconsideration (rel. July 28, 2000).

The Commission should again deny AT&T's Petition on this point. The method of calculating transport minutes was settled in the Year 2000 filing and it would be inequitable to now change this method.

Using the methodology approved in the Year 2000 filing, many LECs have met the access rate targeted in the CALLS order.<sup>4</sup> It would be inequitable to LECs who are still working toward their targeted rate to have the rules changed in midstream. This is especially true given the fact that the meet-point issue was actually raised and rejected during last year's access tariff filing process.

In discussing the meet-point issue in the Petition, AT&T raises the same points and makes the same arguments that it made in its Year 2000 petition. In determining meet-point minutes of use for the Year 2001 filing, Sprint has used the same method that it used in the Year 2000 filing. Given the ongoing implementation of the CALLS access reform plan, it would simply be unfair to change the rules upon which the CALLS plan is based. AT&T's Petition on this issue should, accordingly, be denied.

Respectfully submitted,

SPRINT CORPORATION

By                     //s//                    

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<sup>4</sup> *Access Charge Reform*, CC Docket No. 96-262, Sixth Report and Order, 15 FCC Rcd 12962 (2000) ("CALLS Order").

## **CERTIFICATE OF SERVICE**

I, Joyce Walker, hereby certify that I have on this 29th day of June 2001, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Opposition of Sprint Corporation" in the Matter of July 3, 2001 Annual Access Tariff Filings, CCB/CPD Docket No. 01-08, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.

\_\_\_\_\_/s//  
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