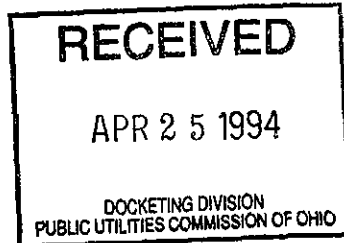




8140 Ward Parkway
P.O. Box 8417
Kansas City, MO 64114-0417

April 22, 1994



VIA FEDERAL EXPRESS

Ms. Daisy Crockron
Public Utility Commission of Ohio
180 East Broad Street
Columbus, Ohio 43266-0573

Re: In the Matter of the Application of Ohio Bell Telephone
Company for Approval of an Alternative Form of
Regulation and for a Threshold Increase in Rates.
Case No.: 93-487-TP-ALT

Dear Ms. Crockron:

Enclosed for filing, please find the original and 21 copies
of Objections to the Staff Report of Sprint Communications
Company L.P. in the above-referenced docket. Please return one
file-stamped copy in the enclosed envelope.

Thank you for your assistance. If you have any questions,
please free to call me at (913) 624-6551.

Very truly yours,

Mary A. Hull

MAH:len
Enclosures

cc: Service List

RECEIVED

APR 25 1994

DOCKETING DIVISION
PUBLIC UTILITIES COMMISSION OF OHIO

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application)
of Ohio Bell Telephone Company)
for Approval of an Alternative)
Form of Regulation and for a)
Threshold Increase in Rates.)

Case No. 93-487-TP-ALT

**OBJECTION TO THE STAFF REPORT
OF SPRINT COMMUNICATIONS COMPANY L.P.**

Sprint Communications Company L.P. (Sprint) submits its objections to the Staff Report of Investigation filed in Case No. 93-487-TP-ALT on March 29, 1994.

1. On page 79-80 of the Staff Report, staff concurs with Ohio Bell's proposal to enter into customer specific contracts.

A. Sprint objects to the failure of staff to recommend that Ohio Bell be required to pass an imputation test for services provided under contract that rely on Cell 1 and/or Cell 2 services as essential inputs to the provision of other firms' competitive services.

2. Sprint objects to the failure of staff to address Ohio Bell's local calling plus rates in its report. Staff should require Ohio Bell to demonstrate that such rates are set above incremental cost, are not predatorially priced, and pass an imputation test.

3. On page 74 of the Staff Report, staff concurs in Ohio Bell's proposed framework for imputation.

A. Sprint objects to the failure of staff to require Ohio Bell to perform adequate imputation studies.

B. Sprint objects to the failure of Staff to require Ohio Bell to impute all rates that competitors must pay, including subsidy payments.

C. Sprint objects to the failure of staff to reject Ohio Bell's proposed imputation test as it is contrary to the Commission's imputation requirement contained in Section XII(A)14) of its alternative regulation rules.

4. On page 79 of the Staff Report, staff states that it would be supportive of Ameritech's request for MFJ relief to the extent it had addressed certain barriers to competition.

A. Sprint objects to staff's recommendation to lift interLATA restrictions because exchange service would not be made competitive simply by lifting certain barriers to competition.

B. Sprint objects to staff's recommendation to lift InterLATA restrictions because jurisdiction over this matter does not lie with the Public Utilities Commission of Ohio.

5. Sprint objects to the failure of staff to require Ohio Bell to make access rate reductions in its report.

A. Sprint objects to the failure of staff to recommend a mechanism that will cap the CCLC and phase down and eventually eliminate that rate element.

B. Sprint objects to the failure of staff to require Ohio Bell to reduce its CCLC access rates to eliminate subsidies built into those rates.

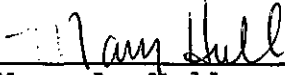
6. On page 71 of the Staff Report, staff concurs with Ohio Bell's proposed LRSIC methodology.

A. Sprint objects to Staff's concurrence with this methodology. The Ohio Bell proposed plan does not provide sufficient information to determine whether the methodology which Ohio Bell will use to determine LRSIC, for any service subject to a cost test, includes an adjustment to LRSIC calculated in compliance with the PUCO's rules. Further Sprint objects to the failure of staff to recommend that LRSIC studies be made available to parties, pursuant to appropriate protective agreements.

7. On page 77-79 of the Staff Report, staff recommends that Ohio Bell implement 1+ IntraLATA presubscription toll service throughout its service territory within 24 months of the plan. Sprint concurs with staff's recommendation, but objects to the failure of staff to recommend a shorter time-frame (12-18 months) for implementation.

Sprint reserves the right to supplement and amend these objections in the event staff subsequently alters or modifies its positions as reflected in the staff report.

Respectfully submitted,



Mary A. Hull
Sprint Communications Company, L.P.
8140 Ward Parkway, 5E
Kansas City, MO 64114
(913) 624-6551
(913) 624-5681 FAX

DATED: 4/22/94

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, first class postage prepaid, this 22nd day of April, 1994 to the following attached service list.

A handwritten signature in cursive script, appearing to read "Linda Nace", is written over a horizontal line.

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