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March 29, 2002

BY HAND DELIVERY

Blanca Bayó
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket No. 000075-TP

Dear Ms. Bayó:

Enclosed for filing on behalf MCImetro Access Transmission Services, LLC, MCI WORLDCOM Communications, Inc., and Intermedia Communications Inc. (collectively "MCI WorldCom") are the original and fifteen copies of MCI WorldCom's Prehearing Statement.

By copy of this letter, copies have been furnished to the parties shown on the attached certificate of service. If you have any questions regarding this filing, please give me a call at 425-2359.

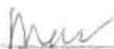
Very truly yours,



Richard D. Melson

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)
appropriate methods to)
compensate carriers for exchange) Docket No. 000075-TP
of traffic subject to Section)
251 of the Telecommunications) Filed: March 29, 2002
Act of 1996.)
_____)

MCI WORLDCOM'S PREHEARING STATEMENT

MCImetro Access Transmission Services, LLC, MCI WORLDCOM Communications, Inc., and Intermedia Communications Inc. (collectively "MCI WorldCom") hereby file their prehearing statement in accordance with the requirements of Order No. PSC-02-0139-PCO-TP.

A. Appearances. Richard D. Melson and Gary V. Perko, Hopping Green & Sams, P.A., P.O. Box 6526, Tallahassee, FL 32314, and Donna C. McNulty, MCI WorldCom, Inc., 325 John Knox Road, The Atrium, Suite 105, Tallahassee, FL 32303, appearing on behalf of MCImetro Access Transmission Services, LLC, MCI WORLDCOM Communications, Inc., and Intermedia Communications Inc.

B. Known Witnesses. MCI WorldCom will present the direct and rebuttal testimony of the following witness:

<u>Witness</u>	<u>Testimony</u>	<u>Issues</u>
Joseph Gillan	Direct and Rebuttal	All

C. Known Exhibits. MCI WorldCom intends to introduce the following exhibits:

<u>Witness</u>	<u>Exhibit</u>	<u>Description</u>
Joseph Gillan	JPG-1	Comparing the Relative Traffic Flows: ALECs, CMRS Providers and Interexchange Carriers (Florida - 2000)
	JPG-2	Comparing Traffic to Revenue
	JPG-3	Declining Importance of intraLATA Calling

MCI WorldCom reserves the right to identify additional exhibits for purposes of cross-examination.

D. Basic Position. In order to promote competition and innovation in the provision of local service, the Commission should define the LATA as the default "local calling area" for the application of reciprocal compensation. The default compensation mechanism should be a cost-based rate, and should be applied to all calls within the LATA. The Commission should not adopt a presumption that traffic is "roughly in balance" because the facts indicate that traffic is clearly not roughly in balance.

E. Issues. MCI WorldCom's positions on the issues identified in Order No. PSC-02-0139-PCO-TP are as follows:

Issue 13. How should a "local calling area" be defined, for purposes of determining the applicability of reciprocal compensation?

- a) What is the Commission's jurisdiction in this matter?
- b) Should the Commission establish a default definition of local calling area for the purpose of intercarrier compensation, to apply in the event parties cannot reach a negotiated agreement?
- c) If so, should the default definition of local calling area for purposes of intercarrier compensation be: 1) LATA-wide local calling, 2) based upon the originating carrier's retail local calling area, or 3) some other default definition/mechanism?

MCI WorldCom: The Commission has jurisdiction to define local calling areas and has seen the incumbents' local calling area steadily expand towards the LATA boundary for the last decade. The Commission should continue this policy by adopting the LATA boundary as the default local calling area for application of reciprocal compensation rates. This would be an important step toward adopting a unified compensation scheme.

Issue 17. Should the Commission establish compensation mechanisms governing the transport and delivery or termination of traffic subject to Section 251 of the Act to be used in the absence of the parties reaching agreement or negotiating a compensation mechanism? If so, what should be the mechanism?

- a) Does the Commission have jurisdiction to establish bill and keep?

- b) What is the potential financial impact, if any, on ILECs and ALECs of bill and keep arrangements?
- c) If the Commission imposes bill and keep as a default mechanism, will the Commission need to define generically "roughly balanced?" If so, how should the Commission define "roughly balanced?"
- d) What potential advantages or disadvantages would result from the imposition of bill and keep arrangements as a default mechanism, particularly in comparison to other mechanisms already presented in Phase II of this docket?

MCI WorldCom: The default compensation mechanism should be a cost-based rate. That rate should be applied to as much traffic as the law allows, i.e., all calls within the LATA. The facts in this case -- including those presented by the ILECS -- clearly show that traffic is not roughly in balance. Bill-and-keep is therefore inappropriate. In light of these facts, the Commission should not adopt a presumption that traffic is roughly in balance. Such a presumption would be of no benefit and could generate unnecessary work for the Commission because individual carriers would be able to rebut it.

F. Stipulations. MCI WorldCom is not aware of any issues that have been stipulated by the parties.

G. Confidentiality Requests. MCI WorldCom has no pending confidentiality requests at this time.

H. Pending Motions. MCI WorldCom has no pending motions

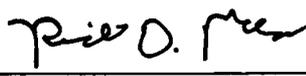
that require action at this time.

I. Requirements of Order. MCI WorldCom believes that this prehearing statement is fully responsive to the requirements of the Order on Procedure.

J. Decisions Impacting Resolution of Case. The Commission's ability to resolve the issues in this case is limited by the requirements of FCC Rules 51.701, 51.705 and 51.713.

RESPECTFULLY SUBMITTED this 29th day of March, 2002.

HOPPING GREEN & SAMS, P.A.

By: 

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following parties by Hand Delivery (*) and/or U.S. Mail this 29th day of March, 2001.

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