



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expanded )  
Interconnection for Alternate )  
Access Vendors within Local )  
Exchange Company Central )  
Offices by Intermedia )  
Communications of Florida, Inc. )  
\_\_\_\_\_ )

Docket No.: 921074-TP  
Filed: July 8, 1993

**PREHEARING STATEMENT BY TIME WARNER AXS OF FLORIDA, L.P.**

COMES NOW, Time Warner AxS of Florida, L.P., ("Time Warner"), pursuant to Rule 25-22.038, Florida Administrative Code, and the Order Establishing Procedure (Order No. PSC-93-0811-PCO-TP), and respectfully submits its Prehearing Statement in the above-captioned docket to the Florida Public Service Commission ("Commission").

**I. SUMMARY STATEMENT OF BASIC POSITION**

Expanded interconnection is in the public interest, and should be available to all telecommunications services providers who do not provide monopoly services. Expanded interconnection offers the consumers of the state the advantage of union between end-users and the most advanced telecommunications technology. This union will facilitate the growth of competitive telecommunications networks which will provide consumers throughout the State with the assurances of uninterrupted telecommunications service.

Under the current structure of Chapter 364 of the Florida Statutes, the Commission does have the authority to enact a statewide expanded interconnection policy. The policy adopted by the Commission should require all local exchange companies within the State to allow competitive telecommunications services providers an equal opportunity to interconnect with their networks.

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To facilitate competition among providers and to assure consistency and quality of service, the Commission should adopt a collocation policy that is consistent with the FCC's collocation policy.

## **II. WITNESSES, TESTIMONY AND EXHIBITS**

Time Warner does not intend to call any witnesses, present testimony or present exhibits in this docket.

## **III. ISSUES OF LAW AND POLICY**

Time Warner recognizes and acknowledges that twenty-one (21) issues of law and policy have been identified and will be addressed by the Commission in this docket. Each is incorporated in this Prehearing Statement by reference, and is believed by Time Warner to be at issue.

### **ISSUE 1:**

**Is expanded interconnection for special access and/or private line in the Public Interest?**

**TIME WARNER'S POSITION:**

Yes.

### **ISSUE 2:**

**How does the FCC's order on expanded interconnection impact the Commission's ability to impose forms and conditions of expanded interconnection that are different from those imposed by the FCC's order.**

**TIME WARNER'S POSITION:**

No position at this time.

**ISSUE 3:**

Under what circumstances should the Commission impose different forms and conditions of expanded interconnection?

**TIME WARNER'S POSITION:**

No position at this time.

**ISSUE 4:**

Does Chapter 364 Florida Statutes allow the Commission to require expanded interconnection?

**TIME WARNER'S POSITION:**

Yes.

**ISSUE 5:**

Does a physical collocation mandate raise federal and/or state constitutional questions about the taking or confiscation of LEC property?

**TIME WARNER'S POSITION:**

No.

**ISSUE 6:**

Should the Commission require physical and/or virtual collocation?

**TIME WARNER'S POSITION:**

The Commission should require physical collocation consistent with the FCC's order on expanded interconnection.

**ISSUE 7:**

What LECs, if any, should be required to provide expanded interconnection?

**TIME WARNER'S POSITION:**

All LECs should be required to provide expanded interconnection.

**ISSUE 8:**

Where should expanded interconnection be offered?

**TIME WARNER'S POSITION:**

No position at this time.

**ISSUE 9:**

Who should be allowed to interconnect?

**TIME WARNER'S POSITION:**

All certificated telecommunications providers should be allowed to interconnect.

**ISSUE 10:**

Should the same terms and conditions of expanded interconnection apply to AT&T as apply to other interconnectors?

**TIME WARNER'S POSITION:**

No position at this time.

**ISSUE 11:**

Should the Commission require standards for physical and/or virtual collocation? If so, what should they be?

**TIME WARNER'S POSITION:**

No position at this time.

**ISSUE 12:**

Should collocators be required to allow LECs and other parties to interconnect with their network?

**TIME WARNER'S POSITION:**

No.

**ISSUE 13:**

What standards should be established for the LECs to allocate space for collocators?

**TIME WARNER'S POSITION:**

No position at this time.

**ISSUE 14:**

Should the Commission allow expanded interconnection for non-fiber optic technology?

**TIME WARNER'S POSITION:**

Yes.

**ISSUE 15:**

If the Commission permits expanded interconnection, what pricing flexibility should the LECs be granted for special access and private line services?

**TIME WARNER'S POSITION:**

No position at this time.

**ISSUE 16:**

If the Commission permits collocation, what rates, terms, and conditions should be tariffed by the LEC?

**TIME WARNER'S POSITION:**

No position at this time.

**ISSUE 17:**

Should all special access and private line providers be required to file tariffs?

**TIME WARNER'S POSITION:**

No position at this time.

**ISSUE 18:**

What separations impact will expanded interconnection have on the LECs?

**TIME WARNER'S POSITION:**

No position at this time.

**ISSUE 19:**

How would ratepayers be financially affected by expanded interconnection?

**TIME WARNER'S POSITION:**

No position at this time.

**ISSUE 20:**

Should the Commission grant ICI's petition?

**TIME WARNER'S POSITION:**

No position at this time.

**ISSUE 21:**

Should expanded interconnection be subject to a "net revenue test" requirement in order to avoid possible cross-subsidy concerns?

**TIME WARNER'S POSITION:**

No position at this time.

**IV. PENDING MATTERS**

Time Warner is unaware of any pending matters at this time.

**RESPECTFULLY SUBMITTED** this 8th day of July, 1993.

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**CERTIFICATE OF SERVICE**  
**DOCKET NO. 921074-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by U.S. Mail on this 8th day of July, 1993, to the following parties of record:

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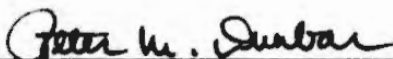
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