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July 8, 1993

VIA HAND DELIVERY

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Mr. Steve Tribble, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399

Re: Petition of Intermedia Communications of Florida, Inc,  
for Expanded Interconnection for AAVs within LEC central  
offices, Docket No. 921074-TP

Dear Mr. Tribble:

Enclosed for filing and distribution is the original and 15  
copies of the Florida Interexchange Carriers Association's  
Prehearing Statement.

ACK 1  
AFA 1  
APP 1  
CAF 1  
Also enclosed is an extra copy of the Florida Interexchange  
Carriers Association's Prehearing Statement. Please stamp with the  
date of filing and return it to me.

CMU 1  
CTR 1  
EAG 1  
A high density disk containing the Prehearing Statement  
labelled fixps.074 is also enclosed. The operating system used is  
Microsoft (R) MS-DOS 3.30 with software WP 5.1.

LEG 1  
Thank you for your assistance.

LIN 6  
CRP \_\_\_\_\_  
RPT \_\_\_\_\_  
E.L. 1  
W'S \_\_\_\_\_

Sincerely,

*Vicki Gordon Kaufman*  
Vicki Gordon Kaufman

OTH -VGR/jwj

Enclosure

DOCUMENT NUMBER-DATE

07340 JUL-83

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Intermedia  
Communications of Florida, Inc. for  
expanded interconnection for  
AAVs within LEC central offices

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

**FLORIDA INTEREXCHANGE CARRIERS  
ASSOCIATION'S PREHEARING STATEMENT**

The Florida Interexchange Carriers Association (FIXCA), through its undersigned counsel, files its Prehearing Statement, pursuant to Order No. PSC-93-0811-PCO-TP.

**APPEARANCES:**

VICKI GORDON KAUFMAN, McWhirter, Grandoff and Reeves, 315 South Calhoun Street, Suite 716, Tallahassee, Florida 32301  
On behalf of the Florida Interexchange Carriers Association (FIXCA)

**A. WITNESSES:**

**SUBJECT MATTER**

**ISSUES**

Joseph P. Gillan

expanded interconnection

1, 10, 15, 17

**B. EXHIBITS:**

None.

**C. STATEMENT OF BASIC POSITION:**

FIXCA's Statement of Basic Position:

The intrastate special access market is relatively minor and subject to different competitive conditions and public policy questions than the switched access market. Accordingly, most critical issues will be addressed in Phase II of this docket. Expanded interconnection for intrastate special access and private line services is likely to only incrementally impact conditions in these markets and is in the public interest.

DOCUMENT NUMBER-DATE

07340 JUL-83

PSC-RECORDS/REPORTING

D. E. F. ISSUES AND POSITIONS:

ISSUE 1: Is expanded interconnection for special access and/or private line in the Public Interest?

FIXCA: Under appropriate conditions, addressing unique problems such as AT&T's collocated arrangements inherited at divestiture and tariffing requirements, expanded interconnection for special access and private line service is in the public interest. (Gillan)

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?

FIXCA: No position at this time.

ISSUE 3: Under what circumstances should the Commission impose different forms and conditions of expanded interconnection?

FIXCA: No position at this time.

ISSUE 4: Does Chapter 364 Florida Statutes allow the Commission to require expanded interconnection?

FIXCA: No position at this time.

ISSUE 5: Does a physical collocation mandate raise federal and/or state constitutional questions about the taking or confiscation of LEC property?

FIXCA: No position at this time.

ISSUE 6: Should the Commission require physical and/or virtual collocation?

FIXCA: No position at this time.

ISSUE 7: What LECs, if any, should be required to provide expanded interconnection?

FIXCA: No position at this time.

ISSUE 8: Where should expanded interconnection be offered?

FIXCA: No position at this time.

ISSUE 9: Who should be allowed to interconnect?

FIXCA: No position at this time.

**ISSUE 10:** Should the same terms and conditions of expanded interconnection apply to AT&T as apply to other interconnectors?

**FIXCA:** The Commission should insure that AT&T does not have an advantage over other carriers due to its previous status as part of the integrated telephone system. Specifically, the Commission should not allow AT&T to qualify for lower cross-connect charges for preexisting collocated circuits in a central office until: a) AT&T establishes new facilities which interconnect like any other interconnection, and b) expanded interconnection is being purchased and made available to other interexchange carriers by a collocated AAV. (Gillan)

**ISSUE 11:** Should the Commission require standards for physical and/or virtual collocation? If so, what should they be?

**FIXCA:** No position at this time.

**ISSUE 12:** Should collocators be required to allow LECs and other parties to interconnect with their networks?

**FIXCA:** No position at this time.

**ISSUE 13:** What standards should be established for the LECs to allocate space for collocators?

**FIXCA:** No position at this time.

**ISSUE 14:** Should the Commission allow expanded interconnection for non-fiber optic technology?

**FIXCA:** No position at this time.

**ISSUE 15:** If the Commission permits expanded interconnection, what pricing flexibility should the LECs be granted for special access and private line services?

**FIXCA:** Expanded interconnection for special access and private line service, per se, does not justify granting the LECs any additional pricing flexibility. The Commission should separately consider, however, whether zone pricing based on identifiable cost differences in service is a reasonable pricing strategy for LEC-provided special access and private line services. (Gillan)

**ISSUE 16:** If the Commission permits collocation, what rates, terms, and conditions should be tariffed by the LEC?

**FIXCA:** No position at this time.



**ISSUE 17: Should all special access and private line providers be required to file tariffs?**

**FIXCA:** Yes. The Commission should require that all access providers tariff their services so that it may guard against discrimination in this market. This requirement is particularly critical with respect to switched access services where any discrimination between access customers -- i.e., the interexchange carriers -- will seriously disrupt interexchange competition. (Gillan)

**ISSUE 18: What separations impact will expanded interconnection have on the LECs?**

**FIXCA:** No position at this time.

**ISSUE 19: How would ratepayers be financially affected by expanded interconnection?**

**FIXCA:** No position at this time.

**ISSUE 20: Should the Commission grant ICI's petition?**

**FIXCA:** 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?**

**FIXCA:** No position at this time.

**G. STIPULATED ISSUES:**

None.

**H. PENDING MOTIONS AND OTHER MATTERS:**

FIXCA has no pending motions.

**I. REQUIREMENTS WHICH CANNOT BE COMPLIED WITH:**

None at this time.

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Attorneys for the Florida  
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Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Florida Interexchange Carriers Association's Prehearing Statement has been furnished by hand delivery\* or by U.S. Mail to the following parties of record, this 8th day of July, 1993:

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