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July 23, 1993

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ORIGINAL
FILE COPY

Mr. Steven Tribble
Executive Director
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32399

~~CONFIDENTIAL~~
Re: Prehearing Statement - Docket No. 921047

Dear Mr. Tribble:

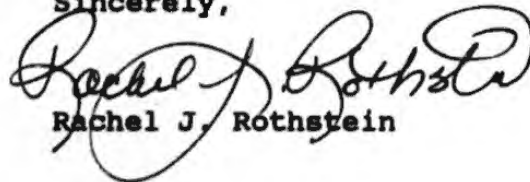
Enclosed please find an original and 15 copies of a revised Prehearing Statement on behalf of the Interexchange Access Coalition in the above-reference proceeding. The revised statement has been served on the appropriate parties.

Also enclosed is a duplicate of this filing. Please date stamp the duplicate and return it to me in the enclosed self-addressed, stamped envelope.

Should any questions arise concerning this filing, please do not hesitate to contact me at the above-referenced number.

ACK ✓
AFA 1
APP _____
CAF _____

Sincerely,


Rachel J. Rothstein

CM Enclosure

CTR _____
cc: Charles Murphy
EAS _____
LES 1
LH 6
COP _____
RCH _____
SEC 1
WAS _____
OTH _____

DOCUMENT NUMBER-DATE

08000 JUL 26 83

1993-RECORDS/RETENTION

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition of Intermedia)
Communications of Florida, Inc.)
for expanded interconnection) Docket No. 921074-TP
for AAVs within LEC central)
offices)
_____)

INTEREXCHANGE ACCESS
COALITION'S PREHEARING STATEMENT

The Interexchange Access Coalition (IAC), through its undersigned counsel, files its Prehearing Statement, pursuant to Order No. PSC-93-0811-PCO-TP. Due to a misunderstanding by IAC, this Prehearing Statement is being filed one week late. IAC respectfully seeks leave of the Commission to make this late filing. IAC submits that no party will be prejudiced by acceptance of this filing, since IAC does not presently intend to participate actively in Phase I of this proceeding. As described in part C below, IAC's interest is limited to the switched access interconnection issues which have been deferred to Phase II of the proceeding.

A. WITNESSES:

None.

B. EXHIBITS:

None.

C. STATEMENT OF BASIC POSITION:

IAC's Statement of Basic Position:

DOCUMENT NUMBER-DATE

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FPC-RECORDS/REPORTING

IAC's interest in this proceeding is limited to issues relating to switched access interconnection. Accordingly, IAC's active involvement is likely to be limited to Phase II of this docket. IAC takes no position at this time regarding most of the issues raised in Phase I.

D. E. F. ISSUES AND POSITIONS:

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

IAC: No position at this time.

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?

IAC: No position at this time.

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

IAC: No position at this time.

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

IAC: 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?

IAC: No position at this time.

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

IAC: No position at this time.

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

IAC: No position at this time.

ISSUE 8: Where should expanded interconnection be offered?

IAC: No position at this time.

ISSUE 9: Who should be allowed to interconnect?

IAC: 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?

IAC: No position at this time.

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

IAC: No position at this time.

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

IAC: No position at this time.

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

IAC: No position at this time.

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

IAC: 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?

IAC: 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.

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

IAC: No position at this time.

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

IAC: Yes. The Commission should require that all access providers tariff their services so that it may guard against

discrimination in this market. The 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.

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

IAC: No position at this time.

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

IAC: No position at this time.

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

IAC: 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?

IAC: No position at this time.

G. STIPULATED ISSUES:

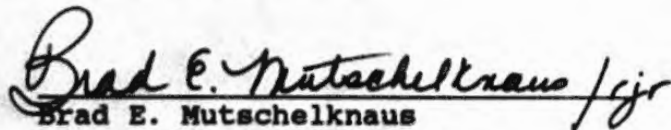
None.

H. PENDING MOTIONS AND OTHER MATTERS:

IAC has no pending motions.

I. REQUIREMENTS WHICH CANNOT BE COMPLIED WITH:

None.



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Attorney for the Interexchange
Access Coalition

July 22, 1993

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of July, 1993, I caused copies of the foregoing "INTEREXCHANGE ACCESS COALITIONS' PREHEARING STATEMENT " to be mailed via first-class postage prepaid mail to the following:

See attached distribution list.


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