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October 22, 1993

BY HAND DELIVERY

Mr. Steven C. Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: **Petition of Intermedia Communications of
Florida, Inc. for Expanded Interconnection
for AAVs within LEC Central Offices**
Docket No. 931074-TP

Dear Mr. Tribble:

Enclosed herewith for filing in the above-styled docket are the original and fifteen (15) copies of ALLTEL Florida, Inc.'s Posthearing Statement.

We are also submitting the Post-Hearing Statement on the enclosed 5", high-density diskette generated on a DOS computer in Word Perfect 5.1 format.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,



J. Jeffrey Wahlen

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
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JJW/csu
Enclosures

cc: All Parties of Record (w/encl.)

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FSC-BUREAU OF RECORDS

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FSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition of Intermedia)
Communications of Florida, Inc. for)
Expanded Interconnection for AAVs)
within LEC Central Offices)

DOCKET NO. 921074-TP
Filed: October 22, 1993

ALLTEL FLORIDA, INC.'S POSTHEARING STATEMENT

Pursuant to Order No. PSC-93-0811-PCO-TP and Rule 25-22.056, Florida Administrative Code, ALLTEL Florida, Inc. ("ALLTEL"), by and through its undersigned counsel, submits the following Posthearing Statement:

I.

Introduction

ALLTEL participated in this proceeding for the purpose of addressing whether mandatory expanded interconnection should be required for Tier 2 local exchange companies ("LECs"). ALLTEL did not file direct testimony, but filed the prepared rebuttal testimony of Harriet E. Eudy on August 10, 1993. Commissioner Johnson, acting as prehearing officer, granted ALLTEL's motion to file that testimony at the Prehearing Conference held on August 11, 1993. Witness Eudy appeared at the final hearing, and her testimony was made part of the record. [Tr. 670-690.]

Consistent with its Prehearing Statement, dated July 8, 1993, ALLTEL does not have a position on Issues 1, 4, 5, 8, 11-18 and 21. ALLTEL notes that issues 2, 3, 9, 10 and 19 were stipulated by the parties and that those stipulations were accepted by the

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Commission. ALLTEL's basic position and its position on issues 6, 7 and 20 are set forth in sections II and III, below.

II.

Basic Position

ALLTEL has no position on the issues in this case as they relate to Tier 1 local exchange companies. As this proceeding may relate to Tier 2 companies like ALLTEL, the FPSC's policy on expanded interconnection for alternative access vendors ("AAVs") should mirror the policy recently adopted by the Federal Communication Commission, i.e., expanded interconnection should not be required for Tier 2 local exchange companies like ALLTEL.

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

***ALLTEL'S POSITION:** ALLTEL has no position on this issue as it relates to Tier 1 local exchange companies. The FPSC should not require physical and/or virtual collocation for Tier 2 local exchange companies like ALLTEL. See ALLTEL's position on Issue 7.

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

***ALLTEL'S POSITION:** ALLTEL has no position on this issue as it relates to Tier 1 companies. As it relates to Tier 2 companies like ALLTEL, the FPSC's policy on expanded interconnection for alternative access vendors should mirror the policy recently adopted by the FCC, i.e., expanded interconnection should not be

required for Tier 2 local exchange companies like ALLTEL. The FCC Order applies only to Tier 1 local exchange companies and, for good reason, specifically exempts all others.

DISCUSSION: ALLTEL is not apposed to competition [Tr. 680], and is not opposed to the concept of collocation per se. [Tr. 688.] ALLTEL will accommodate a request for collocation on a negotiated basis [Tr. 688-689], and if those negotiations fail, either party could petition the Commission. [Id.] In light of the substantial uncertainties surrounding how mandatory expanded interconnection would affect Tier 2 LECs, the FPSC should not impose a mandatory interconnection requirement on Tier 2 LECs at this time for the following reasons:

1. The FCC's first order on expanded interconnection for private line and special access exempted Tier 2 LECs like ALLTEL [Tr. 677-678]. Imposing mandatory collocation on Tier 2 LECs on an intrastate basis would create difficult jurisdictional differences and could provide an avenue for abuse. [Tr. 685.]

2. ALLTEL serves only 1% of the total access lines in Florida. [Tr. 684.]

3. As noted by the FCC, extending an expanded interconnection requirement to Tier 2 LECs could have potential adverse effects on universal service and infrastructure development. [Tr. 678.]

4. As noted by the FCC, demand for collocation in rural areas in the short-term is likely to be limited. [Id.]

5. Over the long-term, increased competition from expanded interconnection will likely put downward pressure on ALLTEL's private line and special access rates and/or result in the loss of private line and/or special access users. [Tr. 680.] This will put upward pressure on the rates ALLTEL charges to its basic local residential and business customers. [Tr. 676.]

6. Because Tier 2 LECs are smaller and serve areas that are less dense (customers per square mile) than Tier 1 LECs, Tier 2 LECs are relatively less able to respond to competitive pressures which will be caused by AAVs and other potential competitors. [Id.]

7. The loss of private line and special access revenues would be relatively more significant to ALLTEL than to Tier 1 LECs. ALLTEL's five largest private line customers account for over 75% of ALLTEL's intrastate private line revenues. [Tr. 681.]

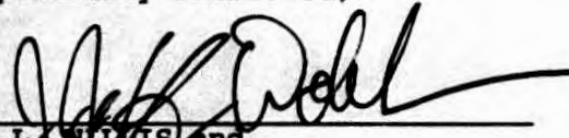
For these reasons, the FPSC should follow the FCC's lead and exempt Tier 2 LECs from any expanded interconnection requirement at this time.

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

***ALLTEL'S POSITION:** See position on Issue 7.

DATED this 22nd day of October, 1993.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 22nd day of October, 1993, to the following:

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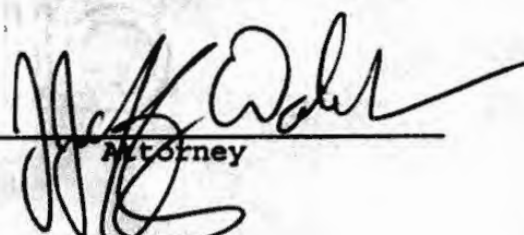
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