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October 22, 1993

VIA HAND DELIVERY

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

Re: Petition for Expanded Interconnection for AAVs within LEC
central offices by Intermedia Communications of Florida,
Inc., Docket No. [REDACTED]

Dear Mr. Tribble:

Enclosed for filing and distribution are the original and 15
copies of the Florida Interexchange Carriers Association's and the
Interexchange Access Coalition's Post-Hearing Statement of Issues
and Positions.

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

Also enclosed is an extra copy of the Florida Interexchange
Carriers Association's and the Interexchange Access Coalition's
Post-Hearing Statement of Issues and Positions. Please stamp with
the date of filing and return it to me.

A high density disk labelled fixphs.074 is enclosed. The
operating system used is Microsoft (R) MS-DOS 3.30 with software WP
5.1.

Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

VGK/jwj
Enclosure
cc: Charles Murphy

DOCUMENT NUMBER-DATE

11442 OCT 22 93

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: October 22, 1993
)
)
)

ORIGINAL
FILE COPY

FLORIDA INTEREXCHANGE CARRIERS ASSOCIATION'S
AND THE INTEREXCHANGE ACCESS COALITION'S
POST-HEARING STATEMENT OF ISSUES AND POSITIONS

The Florida Interexchange Carriers Association (FIXCA) and the Interexchange Access Coalition (IAC), through their undersigned counsel, pursuant to Order No. PSC-93-1274-PHO-TL, file their Post-hearing Statement of Issues and Positions.

SUMMARY OF FIXCA'S 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.

STATEMENT OF ISSUES AND POSITIONS

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

FIXCA's Position: 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.

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's Position: No position.

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

FIXCA's Position: No position.

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

FIXCA's Position: No position.

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

FIXCA's Position: No position.

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

FIXCA's Position: No position.

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

FIXCA's Position: No position.

Issue 8: Where should expanded interconnection be offered?

FIXCA's Position: No position.

Issue 9: Who should be allowed to interconnect?

FIXCA's Position: No position.

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

AT&T should be allowed to interconnect intrastate Special Access Arrangements to the same extent as other parties, subject to the requirements adopted by the FCC in CC Docket 91-141 regarding preexisting collocated facilities.

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

FIXCA's Position: No position.

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

FIXCA's Position: No position.

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

FIXCA's Position: No position.

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

FIXCA's Position: No position.

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

FIXCA's Position: 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?

FIXCA's Position: No position.

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

FIXCA's Position: 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.

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

FIXCA's Position: No position.

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

FIXCA's Position: No position.

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

FIXCA's Position: No position.

Issue 21: Should expanded interconnection be subject to a "net revenue test" requirement in order to avoid possible cross-subsidy concerns?

FIXCA's Position: No position.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Florida Interexchange Carriers Association's and the Interexchange Access Coalition's Post-hearing Statement of Issues and Positions has been furnished by hand delivery* or by U.S. Mail to the following parties of record, this 22nd day of October, 1993:

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