



Florida Cable Telecommunications Association

Steve Wilkerson, President

September 29, 1995

FILE

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: DOCKET NO. 950985-TP

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are an original and fifteen copies of (1) Florida Cable Telecommunications Association, Inc.'s ("FCTA") Prehearing Statement and (2) the Rebuttal Testimony of John Kern on behalf of FCTA. Copies have been served on the parties of record pursuant to the attached certificate of service.

Also enclosed is a copy of FCTA's Prehearing Statement on a 3-1/2" diskette in WordPerfect format, version 5.1.

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

ACK _____ Thank you for your assistance in processing this filing.

_____ Yours very truly,

Chase
_____ *Laura L. Wilson*
_____ Laura L. Wilson
_____ Regulatory Counsel

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_____ Enclosures

cc: Mr. Steven E. Wilkerson
All Parties of Record
Mar

DOCUMENT NUMBER-DATE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Resolution of Petition(s) to establish)
non-discriminatory rates, terms and)
conditions for interconnection involving)
local exchange companies and alternative)
local exchange companies pursuant to)
Section 364.162, Florida Statutes)
_____)

DOCKET NO. 950985-TP

FILED: September 29, 1995

FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION, INC.'S
PREHEARING STATEMENT

The Florida Cable Telecommunications Association, Inc. ("FCTA") pursuant to Order No. PSC-95-1084-PCO-TP and Rule 25-22.038(3), Florida Administrative Code, respectfully submits the following Prehearing Statement in the above-captioned docket.

A. WITNESSES

FCTA will present as witnesses Jeffrey E. Smith, A. R. (Dick) Schleiden and John P. Kern. Their testimony will address Issues Nos. 1 and 2. Mr. Smith and Mr. Schleiden will present direct testimony as a panel. Mr. Kern will present only rebuttal testimony.

FCTA reserves the right to call additional witnesses, if necessary, as may be required by later filed testimony, the completion of discovery, or new issues identified at the prehearing conference.

B. EXHIBITS

FCTA intends to present the following exhibit:

- 1. Exhibit No. ____ (FCTA-2) Clemons' Letter of August 17, 1995.
- 2. Exhibit No. ____ (JPK-1) Resume of John P. Kern.

Exhibit FCTA-1 attached to FCTA's direct testimony is hereby withdrawn. FCTA reserves the right to later identify and sponsor such exhibits as may be required by late filed testimony, the completion of discovery, or new issues identified at the prehearing conference.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

C. BASIC POSITION

The appropriate compensation arrangement between Teleport and BellSouth is a bill and keep arrangement. This is the model used for terminating traffic between BellSouth and the facilities-based Independent LECs in Florida today. BellSouth's proposal, based upon the switched access charge model, will stifle full competition and is discriminatory as applied to an ALEC. No issues other than those interconnection issues raised in Teleport's petition and dispute with BellSouth should be addressed at this time.

D. ISSUES AND POSITIONS

FCTA offers the following prehearing positions on the questions of law, fact and public policy identified for disposition in this docket:

ISSUE 1: What is (are) the appropriate rate structure interconnection rate(s) or other arrangements for the exchange of local and toll traffic between Teleport and Southern Bell?

POSITION: The appropriate local interconnection arrangement is a bill and keep arrangement. This arrangement will prevent unreasonable discrimination between local exchange service providers as required by Section 364.16(3), Florida Statutes. Moreover, it is the only solution that will promote consumer choice among the widest possible array of telecommunications services.

ISSUE 2: Should Southern Bell tariff the interconnection rates(s) or other arrangements?

POSITION: Yes.

ISSUE 3: What are the appropriate technical and financial meet point billing arrangements which should govern interconnection between TCG and BellSouth for the delivery of calls originated and/or terminated from other carriers not directly connected to TCG's network?

POSITION: BellSouth should provide intermediary tandem switching and transport to connect an ALEC's (i.e. Teleport's) end user to the end user of another ALEC, a LEC other than BellSouth, or wireless telecommunications service providers, for the purpose of making local and toll calls.

ISSUE 4: What are the appropriate technical and financial requirements for the exchange of intraLATA 800 traffic which originates from a TCG customer and terminates to an 800 number served by BellSouth?

POSITION: BellSouth should compensate an ALEC (i.e. Teleport) for the origination of 800 traffic terminated to BellSouth pursuant to the ALEC's originating switched access charges. The ALEC will provide to BellSouth the appropriate records necessary for BellSouth to bill its customers. At such time as the ALEC elects to provide 800 services, the ALEC should reciprocate this arrangement.

ISSUE 5: (a) What are the appropriate technical arrangements for the interconnection of TCG's network to BellSouth's 911 provisioning network such that TCG's customers are ensured the same level of 911 service as they would receive as a customer of BellSouth?

POSITION: An ALEC's customers must have the same level of access to reliable 911 service as the LEC providers. For basic 911 service, BellSouth should provide a list

consisting of each municipality in Florida that subscribes to Basic 911 service. The list will also provide the E911 conversion date and, for network routing purposes, a ten-digit directory number representing the appropriate emergency answering position for each municipality subscribing to Basic 911 service. Each ALEC should arrange to accept 911 calls from its customers in municipalities that subscribe to Basic 911 service and translate the 911 call to the appropriate 10-digit directory number as stated on the list provided by BellSouth and route that call to BellSouth at the appropriate tandem or end office. When a municipality converts to E911 service, the ALEC should be required to discontinue the Basic 911 procedures and begin the E911 procedures.

For E911 service, the ALEC should connect Feature Group D trunks to the appropriate E911 tandem, including the designated secondary tandem. If a municipality has converted to E911 service, the ALEC should forward 911 calls to the appropriate E911 primary tandem, along with ANI, based upon the current E911 end office to tandem homing arrangement as provided by BellSouth. If the primary tandem trunks are not available, the ALEC should alternate route the call to the designated secondary E911 tandem. If the secondary tandem trunks are not available, the ALEC should alternate route the call to the appropriate Traffic Operator Position System (TOPS) tandem.

(b) What procedures should be in place for the timely exchange and updating of TCG customer information for inclusion in appropriate E911 databases?

POSITION: In order to ensure the proper working of the system along with accurate customer data, the ALEC should provide daily updates to the E911 database. BellSouth must be required to work cooperatively with the ALEC to define record layouts, media requirements, and procedures for this process.

ISSUE 6: What are the appropriate technical requirements for operator traffic flowing between TCG's operator services provider and BellSouth's operator services provider including busy line verification and emergency interrupt services?

POSITION: BellSouth and an ALEC (i.e. Teleport) should mutually provide each other busy line verification and emergency interrupt services. BellSouth's services should be tariffed.

ISSUE 7: Under what terms and conditions should BellSouth be required to list TCG's customers in its directory assistance database?

POSITION: BellSouth should include an ALEC's (i.e. Teleport's) customers' primary listings (residence and business listings) and yellow page (business) listings in its directory assistance database at no charge.

ISSUE 8: Under what terms and conditions should BellSouth be required to list TCG's customers in its universal white and yellow pages directories and to publish and distribute these directories to TCG's customers?

POSITION: BellSouth should include an ALEC's (i.e. Teleport's) customers' primary listings in the white page and yellow page directories, distribute directories to the customers of each and recycle all customers' directory books at no charge. BellSouth and the ALEC should work cooperatively on issues concerning lead time, timeliness, format, and content of list information.

ISSUE 9: **What arrangements are necessary to ensure that TCG can bill and clear credit card, collect, third party calls and audiotext calls?**

POSITION: FCTA adopts Teleport's position on this issue for purposes of the resolution of the interconnection dispute between Teleport and BellSouth.

ISSUE 10: **What arrangements are necessary to ensure the provision of CLASS/LASS services between Teleport and BellSouth?**

POSITION: BellSouth and the ALEC (i.e. Teleport) should provide LEC-to-LEC Common Channel Signalling (CCS) to one another, where available, in conjunction with all traffic in order to enable full interoperability of CLASS features and functions. All CCS signalling parameters should be provided including Automatic Number Identification (ANI), Originating Line Information (OLI) calling party category, charge number, etc. All privacy indicators should be honored. BellSouth and the ALEC should cooperate on the exchange of Transactional Capabilities Application Point (TCAP) messages to facilitate full interoperability of CCS-based features between their networks. CCS should be provided Signal Transfer Point to Signal Transfer Point.

E. STIPULATIONS

FCTA is not aware of any matters that have been stipulated at this time.


F. PENDING MOTIONS

FCTA has no motions pending at this time.

G. OTHER REQUIREMENTS

There are no requirements of the procedural order that FCTA is unable to comply with.

RESPECTFULLY SUBMITTED this 29th day of September, 1995.

By:  _____
Laura L. Wilson, Esquire
Charles F. Dudley, Esquire
Florida Cable Telecommunications Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301
(904) 681-1990

CERTIFICATE OF SERVICE
DOCKET NO 950985-TP

I **HEREBY CERTIFY** that a true and correct copy of the foregoing been furnished by Hand Delivery(*) and/or Overnight Mail on this 29th day of September, 1995 to the following parties of record:

Tracy Hatch*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Ken Hoffman, Esq.*
Rutledge, Ecenia, Underwood,
Purnell and Hoffman
215 S. Monroe Street, Suite 420
Tallahassee, FL 32301-1841

Jodie Donovan-May, Esq.
Eastern Region Counsel
Teleport Communications Group, Inc.
1133 21st Street, N.W., Suite 400
Washington, DC 20036

Paul Kouroupas
Director, Regulatory Affairs
Teleport Communications Group, Inc.
Two Teleport Drive, Suite 300
Staten Island, NY 10311

Robert G. Beatty
c/o Nancy Sims*
Southern Bell Telephone & Telegraph
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

Jill Butler*
Time Warner Communications
2773 Red Maple Ridge
Tallahassee, FL 32301

Peter Dunbar*
Charles Murphy
Pennington & Haben, P.A.
215 S. Monroe St., 2nd Floor
Tallahassee, FL 32302

Michael Tye*
106 E. College Ave., #1420
Tallahassee, FL 32301-7733

Richard Melson*
Hopping Green Sams &
Smith
123 S. Calhoun Street
P.O. Box 6526
Tallahassee, FL 32314

Richard H. Brashear
P.O. Box 550
Live Oak, FL 32060-0550

F. B. Poag
Central/United Telephone Co.
555 Lake Border Drive
Apopka, FL 32703

Laurie A. Maffett
Frontier Telephone Group
180 South Clinton Avenue
Rochester, NY 14646-0400

Beverly Y. Menard*
c/o Richard Fletcher
106 E. College Ave., #1440
Tallahassee, FL 32301-7704

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DOCKET NO. 950985-TP

A. D. Lanier
Gulf Telephone Company
P. O. Box 1120
Perry, FL 32347-1120

Robert M. Post, Jr.
Indiantown Telephone System, Inc.
P.O. Box 277
Indiantown, FL 34956-0277

Lynne G. Brewer
Northeast Florida Telephone Company
P. O. Box 485
Macclenny, FL 32063-0485

Daniel V. Gregory
Quincy Telephone Company
P. O. Box 189
Quincy, FL 32353-0189

John H. Vaughan
St. Joseph Telephone & Telegraph
P. O. Box 220
Port St. Joe, FL 32456-0220

Ferrin Seay
The Florida Telephone Company
P. O. Box 186
Floral, AL 36442-0186

Lynn B. Hall
Vista-United Telecommunications
P. O. Box 10180
Lake Buena Vista, FL 32830-0180

Michael J. Henry
MCI Telecommunications
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30342

Timothy Devine
Metropolitan Fiber Systems of Florida
6 Century Drive, Suite 300
Parsippany, New Jersey 07054

Floyd R. Self*
Messer Law Firm
215 S. Calhoun St., Suite 701
Tallahassee, FL 32302

James Falvey
Swidler & Berlin
3000 K St. N.W., #300
Washington, D.C. 20007

Patrick Wiggins*
Wiggins & Villacorta
501 E. Tennessee
Tallahassee, FL 32302

By: Arnold Wilson