

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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|--|---|----------------------|
| Resolution of Petition(s) to establish |) | |
| nondiscriminatory rates, terms, and |) | Docket No. 950985-TP |
| conditions for interconnection |) | |
| involving local exchange companies and |) | Date: September 29, |
| alternative local exchange companies |) | 1995 |
| pursuant to Section 364.162, Florida |) | |
| Statutes |) | |

PREHEARING STATEMENT OF
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.

Docket No. 950985-TP

DOCUMENT NUMBER-DATE

09702 SEP 29 1995

FPSC-RECORDS/REPORTING

**PREHEARING STATEMENT OF
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.
Docket No. 950985-TP**

Pursuant to Rule 25-22.038(3), Florida Administrative Code and Order No. PSC-95-0888-PCO-TP, Metropolitan Fiber Systems of Florida, Inc. ("MFS"), by its undersigned attorneys, hereby files this prehearing statement in the Commission's proceeding concerning the interconnection petition of Teleport Communications Group, Inc. ("TCG").

- (a) the name of all known witnesses that may be called by the party, and the subject matter of their testimony;**

Timothy T. Devine will testify as to the appropriate interconnection arrangements (as defined and limited by the list of issues in this proceeding) between TCG and BellSouth and, in particular, the appropriate terminating access compensation mechanism. He will also respond to proposals by other parties on these issues.

- (b) a description of all known exhibits that may be used by the party, whether they may be identified on a composite basis, and the witness sponsoring each;**

MFS does not intend to sponsor any exhibits at this time.

- (c) a statement of basic position in the proceeding;**

MFS believes that the most efficient, administratively simple and equitable method of compensation for terminating access is the bill and keep method based on the in-kind exchange of traffic between co-carriers. This is the only method guaranteed to preclude a price squeeze. MFS advocates other co-carrier arrangements, including the establishment of traffic exchange districts, tandem subtending, meet-point

billing for the seamless exchange of traffic; and other arrangements that will permit competitive entry without undue barriers to entry while keeping ALEC service transparent to end users.

- (d) **MFS offers the following prehearing positions on the questions of law, fact and public policy identified for disposition in this docket.**

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

Position: The appropriate interconnection "rate" is the bill and keep method of traffic exchange whereby traffic is exchanged on a mutual basis with in-kind as opposed to cash compensation.

2. Issue: Should Southern Bell tariff the interconnection rate(s)?

Position: Yes.

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

Position: MFS supports the mutual exchange of traffic based on traffic exchange districts ("TEDs"), tandem subtending, and meet-point billing. TEDs would be designed around existing LEC tandem switches; within each TED, all carriers and BellSouth should jointly establish at least one mutually acceptable location as a Traffic Exchange Meet-Point; all carriers would be permitted to interconnect at (or "sub-tend") the LEC tandem; and meet-point billing would follow established industry guidelines.

4. Issue: 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: New entrants have no ability to route 800 numbers to the appropriate local or long distance carrier. BellSouth should therefore be required to do a database dip and route TCG 800 number calls to the appropriate carrier.

5. Issue: 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? b) What procedures should be in place for the timely exchange and updating of TCG

customer information for inclusion in appropriate E911 databases?

Position: a) BellSouth should adopt the proposal agreed to by NYNEX and MFS in New York. b) BellSouth should provide on-line access for immediate updates of the E-911 database.

6. Issue: 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: Because ALECS and BellSouth should be able to interrupt calls in emergency situations, BellSouth should provide LEC-to-LEC Busy Line Verification and Interrupt ("BLV/I") trunks to one another to enable each carrier to support this functionality. ALECs and BellSouth should compensate one another for the use of BLV/I according to the effective rates listed in BellSouth's federal and state access tariffs, as applicable.

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

Position: The Commission should require BellSouth to list competing carriers' customers in their directory assistance

databases and should require all carriers (both LECs and ALECs) to make their directory listings available to one another. In general, all LECs should be required to update their directory assistance databases with data provided by competitors on at least as timely a basis as they update these databases with information regarding their own customers.

8. Issue: 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: The Commission should require BellSouth to list competing carriers' customers in their White and Yellow Pages directories and should require all BellSouth to distribute these directories to TCG customers at no charge.

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

Position: Consolidated billing should be required where appropriate by providing for a single master bill for each wire center for calls provided by BellSouth's interim number portability service, that will enable TCG to re-bill its end users for collect, calling card, third-party billed and

audiotext calls. Carriers should also be required to enter into mutual billing and collection agreements.

10. Issue: What arrangements are necessary to ensure the provision of CLASS/LASS services between TCG's and BellSouth's interconnected networks?

Position: ALECs and BellSouth should provide LEC-to-LEC CCS to one another, where available, in conjunction with LATA-wide traffic, in order to enable full inter-operability of CLASS features and functions. All CCS signalling parameters should be provided, including automatic number identification, originating line information, calling party category, charge number, etc.

(g) a statement of issues that have been stipulated to by the parties;

None.

(h) a statement of all pending motions or other matters the party seeks action upon;


None.

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- (i) a statement as to any requirement set forth in this order that cannot be complied with, and the reasons therefor.

None.

Respectfully submitted,



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