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**PENNINGTON & HABEN**

A PROFESSIONAL ASSOCIATION  
**ATTORNEYS AT LAW**

BARBARA D. AUGER  
WILLIAM W. BLUE  
D. ANDREW BYRNE †  
BRAM D. E. CANTER  
ROBERT CINTRON, JR.  
ROBERT S. COHEN  
CHARLES L. COOPER, JR.  
BRUCE CULPEPPER  
SONYA KROUSKOP DAWS  
PETER M. DUNBAR  
DAVISSON F. DUNLAP, JR.  
JOHN FRENCH  
RALPH H. HABEN, JR.  
SHARON N. JACOBS  
MICHAEL A. KLINER  
DANIEL E. MANAUSA

DAVID K. MINACCI  
CHARLES W. MURPHY  
JOHN C. PELHAM  
CARL R. PENNINGTON, JR., P.A.  
RONALD R. RICHMOND  
C. EDWIN RUDE, JR.  
DARREN A. SCHWARTZ  
NANCY BLACK STEWART  
CYNTHIA S. TUNNICLIFF  
WILLIAM E. WHITNEY  
BEN H. WILKINSON  
CATHI C. WILKINSON  
† Also Admitted in Tennessee

OF COUNSEL  
R. STUART HUFF, P.A.  
Coral Gables, Florida  
CHRISTOPHER W. KANAGA  
(Admitted in Massachusetts & Colorado Only)  
SCOTT MADDOX  
WILLIAM VANDERCREEK  
(Admitted in Texas & Iowa Only)  
SPECIAL CONSULTANTS  
JOHN F. BLACK, III\*  
RANDY MILLER\*  
DAVID L. SWAFFORD\*  
\*Not A Member Of The Florida Bar

215 SOUTH MONROE STREET  
2ND FLOOR  
TALLAHASSEE, FLORIDA 32301  
(904) 222-3533  
FAX (904) 222-2126  
E-Mail Phlaw@Supernet.net

1002 WEST 23RD STREET, SUITE 350  
PANAMA CITY, FLORIDA 32405  
(904) 769-7864

**REPLY TO:**  
**P.O. BOX 10095**  
**TALLAHASSEE, FL 32302-2095**

September 29, 1995

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

**via Hand Delivery**

Re: Investigation into Temporary Local Telephone Number  
Portability Solution to Implement Competition in  
Local Exchange Telephone Markets  
Docket No. 950737-TP

Dear Ms. Bayo:

Enclosed for filing please find an original and fifteen copies of Time Warner AxS of Florida, L.P.'s and Digital Media Partners' Prehearing Statement for the above-referenced docket. You will also find a copy of this letter and a diskette in Word Perfect 5.1 format enclosed. Please date-stamp the copy of this letter to indicate that the original was filed and return to me.

If you have any questions regarding this matter, please feel free to contact me.

Respectfully,

PENNINGTON & HABEN, P.A.

Peter M. Dunbar

*Krylie*  
PMD/tmz  
Enclosures

cc: All Parties of Record (w/ enclosure)

DOCUMENT NUMBER-DATE

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CERTIFICATE OF SERVICE  
DOCKET NO. 950737-TP

I HEREBY CERTIFY that a true and correct copy of Time Warner AXS of Florida, L.P.'s and Digital Media Partners' Prehearing Statement has been served by either \*Federal Express or Hand Delivery on this 29th day of September, 1995, to the following parties of record:

Ms. Jill Butler  
Florida Regulatory Director  
2773 Red Maple Ridge  
Tallahassee, FL 32301

\*Anthony P. Gillman  
Kimberly Caswell  
GTE Florida Incorporated  
Post Office Box 110, FLTC0007  
Tampa, FL 33601-0110

Laura L. Wilson, Esq.  
Florida Cable Telecommunications  
Association, Inc.  
310 North Monroe Street  
Tallahassee, FL 32301

Monica M. Barone, Staff Counsel  
Florida Public Service Comm.  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Floyd R. Self, Esq.  
Messer, Vickers, Caparello,  
Madsen, Goldman & Metz, P.A.  
Post Office Box 1876  
Tallahassee, FL 33401

\*William H. Higgins, Esq.  
Cellular One  
Suite 900  
250 S. Australian Avenue  
West Palm Beach, FL 33401

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs,  
Odom & Ervin  
305 S. Gadsden Street  
Post Office Drawer 1170  
Tallahassee, FL 32302

\*Tony H. Key, Director  
State Regulatory-South Sprint  
3100 Cumberland Circle  
Atlanta, GA 30309

\*Timothy Devine  
MFS Communications Company, Inc.  
6 Century Drive, Suite 300  
Parsippany, NJ 07054

\*Richard M. Rindler  
James C. Falvey  
Swindler & Berlin, Chartered  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007

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

Richard D. Melson  
Hopping, Green, Sams & Smith  
Post Office Box 6526  
123 South Calhoun Street  
Tallahassee, FL 32314

Michael W. Tye, Esq.  
106 East College Avenue  
Suite 1410  
Tallahassee, FL 32301

\*Robin D. Dunson, Esq.  
1200 Peachtree St., NE  
Promenade I, Room 4038  
Atlanta, GA 30309

F. Ben Poag  
Sprint/United Telephone  
Company of Florida  
Post Office Box 2214  
Tallahassee, FL 32316

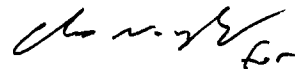
Lee L. Willis  
J. Jeffry Wahlen  
Macfarlane, Ausley, Ferguson  
and McMullen  
Post Office Box 391  
Tallahassee, FL 32302

Angela B. Green  
Florida Public  
Telecommunications Assn., Inc.  
125 S. Gadsden Street  
Suite 200  
Tallahassee, FL 32301

Patrick K. Wiggins  
Wiggins & Villacorta, P.A.  
Post Office Drawer 1657  
501 East Tennessee Street  
Tallahassee, FL 32302

Marsha E. Rule, Esq.  
Wiggins & Villacorta, P.A.  
Post Office Drawer 1657  
501 East Tennessee Street  
Tallahassee, FL 32302

Robert G. Beatty  
J. Philip Carver  
c/o Nancy H. Sims  
Southern Bell Telephone &  
Telegraph Company  
150 S. Monroe St., Suite 400  
Tallahassee, FL 32301



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PETER M. DUNBAR, ESQ.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation into Temporary ) Docket No. 950737-TP  
Local Telephone Number Portability ) Filed: September 29, 1995  
Solution to Implement Competition in )  
Local Exchange Telephone Markets )  
\_\_\_\_\_ )

**PREHEARING STATEMENT BY TIME WARNER AXS OF FLORIDA, L.P.  
AND DIGITAL MEDIA PARTNERS**

COMES NOW, Time Warner AxS of Florida, L.P. and Digital Media Partners (collectively "Time Warner"), and pursuant to Rule 25-22.038, Florida Administrative Code, and the Order Establishing Procedure (Order No. PSC-95-0896-PCO-TP), respectfully submits its Prehearing Statement in the above-captioned docket to the Florida Public Service Commission ("Commission" or "FPSC").

**A. WITNESSES, TESTIMONY AND ISSUES**

Direct Testimony:

Witness Danny G. Engleman Issues 3, 4, 5

Rebuttal Testimony:

Witness Danny G. Engleman Issues 4, 5, 8

**B. EXHIBITS**

Direct Testimony:

DGE-1 Mr. Engleman's qualifications

DGE-2 Diagram of remote call forwarding

Rebuttal Testimony:

DGE-3 Time Warner's Comments to the Federal Communications Commission in the Matter of Telephone Number Portability CC Docket No. 95-116.

**C. STATEMENT OF BASIC POSITION**

The ability for a customer to change its local service provider without changing telephone numbers is widely acknowledged

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FPSC-RECORDS/REPORTING

as an important component in the development of local competition. A permanent number portability solution does not exist today, but the Florida Legislature has mandated that a temporary mechanism be available on January 1, 1996. The parties to this docket have agreed that Remote Call Forwarding ("RCF") can be implemented as a temporary mechanism. However, Remote Call Forwarding is fraught with significant problems, including call set-up delays, keeping the local exchange companies (LECs) in the revenue stream for terminating access charges, and limiting some feature availability to number ported customers. Despite the many disadvantages of RCF, alternate local exchange companies (ALECs) need to have service number portability to attract customers. Thus, the pricing of the temporary number portability mechanism is an important aspect of interconnection between the LEC and ALEC networks.

Time Warner filed comments with the FCC in its number portability proceeding stating that there should be no charge for Remote Call Forwarding as a temporary number portability mechanism because of the technical and competitive difficulties associated with RCF. However, in Florida, Time Warner has proposed a price of \$1.00 for two paths, and \$.50 for additional paths because the Florida Statutes require that the prices and rates for temporary number portability not be below cost. No cost studies for Remote Call Forwarding as a temporary number portability mechanism have yet been filed; however, the rates proposed by Time Warner will allow it to do business in Florida assuming interconnection rates are reasonable. Time Warner could also support the positions of

MCI Metro or Metropolitan Fiber Systems for a cost recovery mechanism for remote call forwarding.

**D-G. ISSUES AND POSITIONS**

**ISSUE 1:** What is the definition of temporary number portability pursuant to Section 364.16(4), Florida Statutes?

**TIME WARNER'S POSITION:** This issue is resolved by the approved stipulation.

**ISSUE 2:** What technical solutions will be available by January 1, 1996 to provide temporary number portability?

**TIME WARNER'S POSITION:** This issue is resolved by the approved stipulation.

**ISSUE 3:** What are the advantages and disadvantages of each solution identified in Issue 2?

**TIME WARNER'S POSITION:** The advantages of remote call forwarding ("RCF") are:

1. It can be offered today in all switches that are stored program control switches.
2. Only one translation change would be required.
3. Screening List CLASS features in customer's new central office would still work.
4. RCF does not require the addition of extra or special inter-office trunks if call volume is low.
5. RCF supports the use of SS7 signaling.
6. RCF can be applied on a line-by-line basis.

The disadvantages of RCF are:

1. There would be a call set-up delay of 2 to 3 seconds.
2. The actual network number (the ported number) would not be known to customers, creating confusion when calls were placed from this number to subscribers of Caller Identification. The number displayed at the far end would not be the directory number, but would be the ported number.
3. RCF requires the use of two number assignments.
4. The engineered capability of a given switch may pose a problem in regards to the number of call forwards the switch can support at any one time. This would depend on how many customers were assigned this option.
5. Some types of calls (e.g., interLATA calls terminating through the access tandem, or local calls from the ALEC switch to the directory number which are then routed back over the same trunk) may require extra trunks, depending on call volume.
6. Administration would be required to insure the appropriate RCF changes are made in the affected office when a customer moves to a new local service provider. Disconnecting numbers would also have to be tracked.
7. RCF for two lines would be necessary to enable call waiting for the ported customer.
8. The incumbent LEC would remain in the revenue stream for terminating access revenues.

9. For 911 purposes, it is not clear that the ported number would be able to be displayed at the Public Safety Answering Point (PSAP) in all cases, and if it is, it will require training of the PSAP operator.
10. CLASS features Automatic Recall and Automatic Call Back are disabled following a call to the ported number.
11. The Calling Party Number (CgPN) field on which CLASS features are based when the ported customer originates a call will not show the ported number and Caller ID and features that screen on Caller ID will fail. This is similar to disadvantage #2.
12. Second number use is inconsistent with a long term database solution.

**ISSUE 4: What costs are associated for providing each solution identified in Issue 2?**

**TIME WARNER'S POSITION:** Time Warner does not have explicit information regarding recurring costs associated with Remote Call Forwarding. The costs which should be considered significant are those of the LECs, since ALECs will be dependent on LECs for number portability much more than the LECs ever will be dependent on ALECs. The costs include any additional load on the LEC switch, which will be switching calls it would not otherwise, the recurring capital cost of the port, which will vary by central office type, and the cost of transport, which will add small increments of traffic to the LEC trunks between the end office and tandem



switches. Since this traffic will not be over dedicated facilities, but mixed in with all other traffic on digital or fiber optic trunks, the incremental cost will be slight.

Nonrecurring costs include the labor time to receive and process a service order, transmit this information to the switch translation employee, who then writes the translation. Also, the labor involved in physically putting up the port (one per ported number) should be included.

**ISSUE 5: How should the costs identified in Issue 4 be recovered?**

**TIME WARNER'S POSITION:** The costs for remote call forwarding as a temporary number portability mechanism should be recovered on a flat rate per line per month basis, uniform throughout an individual LEC's existing service territory, as stipulated by the parties to this docket. Time Warner has proposed a price of \$1.00 per line with two paths, with a charge of \$.50 for each additional path. A nonrecurring charge of \$10.00 per order is appropriate. However, if the Commission does not adopt Time Warner's recommendation, Time Warner does not object to the approach proposed by MCI Metro or TCG.

**ISSUE 6: What is/are the most appropriate method(s) of providing temporary number portability?**

**TIME WARNER'S POSITION:** This issue is resolved by the approved stipulation.

**ISSUE 7:** What are the appropriate parameters, costs and standards for the method(s) identified in Issue 6?

**TIME WARNER'S POSITION:** This issue is resolved by the approved stipulation.

**ISSUE 8:** Should the docket be closed?

**TIME WARNER'S POSITION:** No. The Commission should leave this docket open as a forum for the number portability standards group to continue its work to investigate and develop a permanent number portability solution.

#### **H. STIPULATIONS**

Issues 1, 2, 6, and 7 have been resolved by the approved stipulation of the parties.

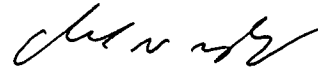
#### **I. PENDING MOTIONS**

On September 6, 1995, Time Warner filed a Motion to Accept Direct Testimony and Exhibits of Danny G. Engleman.

**J. COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE**

Time Warner is not aware of any requirement in the Procedural Order with which it cannot comply.

**RESPECTFULLY SUBMITTED** this 29th day of September, 1995.



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**PETER M. DUNBAR, ESQ.**

Fla. Bar No. 146594

**CHARLES W. MURPHY, ESQ.**

Fla. Bar No. 853712

Pennington & Haben, P.A.

Post Office Box 10095

Tallahassee, Florida 32302-2095

(904) 222-3533

(904) 222-2126 (facsimile)

Counsel for: Time Warner AxS of  
Florida, L.P. and  
Digital Media Partners