

12/15/95

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s) to establish nondiscriminatory rates, terms, and conditions for interconnection involving local exchange companies pursuant to Section 364.162, Florida Statutes

Docket No. 950985-TP Filed: 10/12/95

INTERMEDIA COMMUNICATIONS OF FLORIDA, INC.'s REVISED PREHEARING STATEMENT

Intermedia Communications of Florida, Inc. (ICI) files this revised prehearing statement.

- A. Witnesses: None
B. Exhibits: At this time, ICI does not plan to introduce exhibits, but reserves the right to introduce cross-examination exhibits if necessary.
C. ICI's Basic Position:

The best method of interconnection compensation is a bill and keep arrangement. This is the method that local exchange companies (LECs) use today for local interconnection with one another. Bill and keep is administratively simple, and allows competitors to choose a network architecture which is most efficient. In addition, bill and keep is most likely to produce the benefits of competition for consumers. In technical interconnection arrangements, Intermedia supports TCG's efforts to be treated as a co-carrier.

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ISSUES

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

ICI's POSITION: The appropriate interconnection is bill and keep.

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

ICI's POSITION: Yes.

ISSUE 3: 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?

ICI's POSITION: To facilitate delivery from/to carriers not directly connected to TCG, BellSouth should establish a workable meet point trunking and billing arrangement with TCG.

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?

ICI's POSITION: BellSouth should compensate TCG for the origination of 800 traffic pursuant to TCG's originating switched access charges. If TCG provides 800 services, this

arrangement should be reciprocal.

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?

ICI's POSITION: TCG's customers must have the same level of access to reliable 911 service as do LEC customers. ICI takes no position as to how TCG and Southern Bell should work together to ensure this level of service.

ISSUE 5(b): What procedures should be in place for the timely exchange and updating of TCG customer information for inclusion in appropriate E911 databases?

ICI's POSITION: BellSouth should provide on-line access for immediate updates of the E-911 database.

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?

ICI's POSITION: TCG and BellSouth should provide each other with busy line verification and emergency interrupt services pursuant to tariffed rates.

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

ICI's POSITION: BellSouth should include TCG's customers in its directory assistance database at no charge in return for securing the value of TCG's customer list towards its universal listing of all users of the public switched network.

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?

ICI's POSITION: Without charge, BellSouth should print TCG's listings in its white and yellow pages, distribute its directories to TCG's customers and recycle TCG's customers' directories.

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

ICI's POSITION: TCG and BellSouth should bill and clear intraLATA credit card, collect and third party calls through BellSouth's Centralized Message Distribution Service.


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

networks?

**ICI's POSITION:** TCG and BellSouth should provide LEC-to-LEC Common Channel Signalling to one another, where available and including all signalling parameters, for all traffic in order to enable full interoperability of CLASS features and functions.

- E. QUESTIONS OF LAW: None.
- F. POLICY QUESTIONS: None.
- G. STIPULATED ISSUES: None.
- H. PENDING MOTIONS OR OTHER MATTERS: None.
- I. REQUIREMENTS THAT CANNOT BE COMPLIED WITH: None.

Respectfully submitted this 12th day of October, 1995.

  
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PATRICK K. WIGGINS  
WIGGINS & VILLACORTA, P.A.  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
(904) 222-1534

Counsel for INTERMEDIA  
COMMUNICATIONS OF FLORIDA, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of Intermedia Communications of Florida, Inc.'s Revised Prehearing Statement in Docket No. 950985-TP has been furnished this 12th day of October, 1995, to the following:

Robert V. Elias  
Staff Counsel  
Florida Public Service  
Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Charles Beck  
Deputy Public Counsel  
Office of the Public Counsel  
111 W. Madison Street, Rm. 812  
Tallahassee, FL 32399-1400

Clay Phillips  
Utilities & Telecommunications  
Room 410 House Office Building  
Tallahassee, FL 32399

Nels Roseland  
Executive Office of  
the Governor  
Office of Planning and Budget  
The Capitol, Room 1502  
Tallahassee, FL 32399-0001

Greg Krasovsky  
Commerce & Economic  
Opportunities  
Room 426 Senate Office Bldg.  
Tallahassee, FL 32399

Lee L. Willis  
J. Jeffrey Wahlen  
Macfarlane, Ausley, Ferguson  
and McMullen  
227 S. Calhoun St.  
Tallahassee, FL 32301

Charles Murphy  
Pennington Haben  
Second Floor  
215 S. Monroe Street  
Tallahassee, FL 32302

Kimberly Caswell  
c/o Nancy H. Sims  
Southern Bell  
150 S. Monroe St., Ste. 400  
Tallahassee, FL 32301

Gary T. Lawrence  
City of Lakeland  
501 East Lemon Street  
Lakeland, FL 33801-5079

Steven D. Shannon  
MCI Metro Access Transmission  
Services, Inc.  
2250 Lakeside Blvd.  
Richardson, TX 75082

Andrew D. Lipman  
Metropolitan Fiber Systems  
of Florida, Inc.  
One Tower Lane, Suite 1600  
Oakbrook Terrace, IL 60181-4630

F. Ben Poag  
Sprint/United - Florida  
Sprint/Centel - Florida  
Post Office Box 16500  
(M.C. #5326)  
Altamonte Springs, FL 32716

CERTIFICATE OF SERVICE  
DOCKET NO. 950985-TP  
7

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

James C. Falvey  
Swidler & Berlin, Chartered  
3000 K St., NW, Ste. 300  
Washington, D.C. 20007

Kenneth A. Hoffman  
Rutledge, Ecenia, Underwood,  
and Hoffman  
215 S. Monroe, St., Ste. 420  
Tallahassee, FL 32301

David B. Erwin  
Young, van Assenderp, et al  
Post Office Box 1833  
Tallahassee, FL 32301

Graham A. Taylor  
TCG South Florida  
1001 W. Cypress Creek Road  
Suite 209  
Ft. Lauderdale, FL 33309-1949

John Murray  
Payphone Consultants, Inc.  
3431 N.W. 55th Street  
Ft. Lauderdale, FL 33309-6308

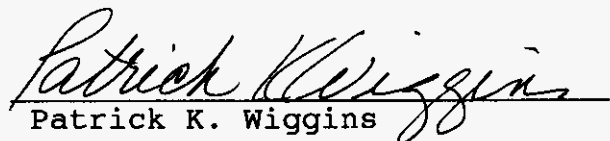
Leo I. George  
Winstar Wireless of  
Florida, Inc.  
1146 19th Street, N.W.  
Suite 200  
Washington, D.C. 20036

Jodie Donovan-May  
TCG - Washington, DC  
2 Lafayette Center  
1133 Twenty First Street, N.W.  
Suite 400  
Washington, D.C. 20036

Leslie Carter  
Digital Media Partners  
1 Prestige Place, Suite 255  
Clearwater, FL 34619-1098

H.W. Goodall  
Continental Fiber  
Technologies, Inc.  
4455 BayMeadows Road  
Jacksonville, FL 32217-4716

Richard A. Gerstemeier  
Time Warner AxS of Florida,  
Inc.  
2251 Lucien Way, Suite 320  
Maitland, FL 32751-7023

  
Patrick K. Wiggins