

November 3, 1995

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

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

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Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of Metropolitan Fiber Systems of Florida, Inc.'s ("MFS") Post-Hearing Statement, Proposed Findings of Fact and Conclusions of Law, and Post-Hearing Brief. Enclosed please also find a disk copy of the foregoing pleadings.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning it in the enclosed self-addressed envelope.

Thank you for your attention to this matter.

Sincerely,

Richard M. Rindler
James C. Falvey

Counsel for
Metropolitan Fiber Systems of Florida, Inc.

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**BEFORE THE
FLORIDA
PUBLIC SERVICE COMMISSION**

In Re: Investigation into temporary local telephone number portability solution to implement competition in local exchange telephone markets.)
) Docket No. 950737-TP
)
) Filed: November 6, 1995

**POST-HEARING STATEMENT OF
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.**

Pursuant to Rule 25-22.038(3), Florida Administrative Code and Order No. PSC-95-1246-PHO-TP, Metropolitan Fiber Systems of Florida, Inc. ("MFS"), by its undersigned attorneys, hereby files this post-hearing statement of issues and positions.

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

* Pursuant to the Commission-approved stipulation in this proceeding, temporary number portability is defined as an end user's ability at a given location to change service from a local exchange company to an alternative local exchange company or vice versa, or between two ALECs, without changing their local telephone number.

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

* Pursuant to the Commission-approved stipulation in this proceeding, the only technical solution that will be available by January 1, 1996 is remote call forwarding. However, the parties agree that the LECs will continue to negotiate with the ALECs who desire to utilize Flexible Direct Inward Dialing.

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

- * RCF provides the critical function of permitting end users to change local service providers while retaining their existing telephone number, with virtually no impact to the incumbent LEC's customer base and network. RCF, however, requires all calls to be routed to the LEC switch before they can be forwarded to MFS.

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

- * There are limited direct incremental switching costs, as well as certain trunking and processing costs. The RCF rate should include, direct incremental costs with no contribution. LEC costs should be carefully analyzed by the Commission and the parties.

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

- * Pursuant to the Commission-approved stipulation in this proceeding, the cost is to be assessed on a per-line, per-month basis. RCF should be a monthly rate assessed on all working telephone numbers. As all subscribers benefit from RCF, the costs of RCF should be spread evenly across the entire subscriber base.

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

- * Pursuant to the Commission-approved stipulation in this proceeding, Remote Call Forwarding is the most appropriate method to provide temporary number portability by January 1, 1996. The parties will continue to negotiate possible future options if a party desires a different option.

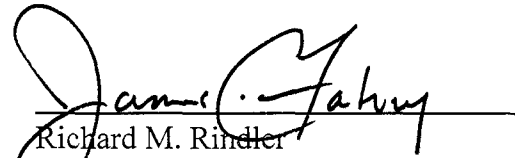
ISSUE 7: What are the appropriate parameters, costs and standards for the method(s) identified in Issue 6?

- * Pursuant to the Commission-approved stipulation in this proceeding, LECs shall offer RCF to certificated ALECs effective January 1, 1996. There will be coordination with 911 systems and the price charged for RCF will not be below costs. *See* Statement of MFS Position on Issues 2, 5 and 6.

ISSUE 8: Should the docket be closed?

* No. It should be left open to monitor implementation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James C. Falvey", is written over a horizontal line.

Timothy T. Devine
MFS Communications Company, Inc.
250 Williams Street
Suite 2200
Atlanta, Georgia 30303
(404) 224-6600

Richard M. Rindler
James C. Falvey
SWIDLER & BERLIN, CHARTERED
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007
(202) 424-7500

**CERTIFICATE OF SERVICE
DOCKET NO. 950737-TP**

I hereby certify that on this 3rd day of November 1995, copies of Post-Hearing Statement of Metropolitan Fiber Systems of Florida, Inc. was served via overnight delivery and/or first class mail, postage prepaid, on the following:

Laurie A. Maffett
Manager, Regulatory Matters
Frontier Communications of the
South, Inc.
Frontier Telephone Group
180 South Clinton Avenue
Rochester, NY 14646-0400

F. B. (Ben) Poag
Sprint/United-Florida
Sprint/Centel-Florida
555 Lake Border Drive
Apopka, Florida 32716

Robert M. Post, Jr.
Indiantown Telephone System, Inc.
16001 Southwest Market St.
Indianatown, FL 34956-0277

Beverly Y. Menard
c/o Richard M. Fletcher
GTE Florida Incorporated
106 East College Avenue
Suite 1440
Tallahassee, FL 32301-7704

John A. Carroll, Jr.
Northeast Florida Telephone
Company, Inc.
P. O. Box 485
Macclenny, FL 32063-0485

Ferrin Seay
The Florala Telecommunications Co.
522 N. 5th Street
P. O. Box 186
Florala, AL 36442-0186

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Irvin
305 S. Gadsden St.
P. O. Drawer 1170
Tallahassee, FL 32302

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

John H. Vaughan
St. Joseph Telephone &
Telegraph Co.
502 Fifth St.
Port St. Joe, FL 32456-0220

Richard D. Melson
Hopping Green Sams & Smith
123 S. Calhoun Street
P. O. Box 6526
Tallahassee, FL 32301

Michael Tye
AT&T Communications of the
Southern States, Inc.
106 E. College Avenue
Suite 1410
Tallahassee, FL 32301-7733

Florida Interexchange Carriers
Association
c/o J.P. Gillan & Associates
P. O. Box 541038
Orlando, FL 32854-1038

Gina M. Lee
Hayes Telecommunications
Services, Inc.
1311-A Paul Russell Road
Suite 201
Tallahassee, FL 32301

Lee McDowell
Hyperion Telecommunications
of Florida, Inc.
5 W. 3rd Street
Coudersport, PA 16915

Donald D. Bowden
Gulf Telecommunications
P. O. Box 1120
Perry, FL 32347

Susan C. Langston
Florida Telephone Association
P. O. Box 1776
Tallahassee, FL 32302

Tony H. Key, Director
State Regulatory-South
Sprint
3100 Cumberland Circle
Atlanta, GA 30339

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

Richard H. Brashear
Harriet Eudy
ALLTEL Florida, Inc.
206 White Avenue
P. O. Box 550
Live Oak, FL 32060

Jill Butler
Digital Media Partners
Time Warner Communications
2773 Red Maple Ridge
Tallahassee, FL 32301

Angela Green
Florida Public
Telecommunications Assn.
125 S. Gadsden St.
#200
Tallahassee, FL 32301-1525

William H. Higgins, Esq.
McCaw Cellular Communications, Inc.
c/o Cellular One
250 S. Australian Avenue
Suite 900
West Palm Beach, FL 33401

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Goldman & Metz, P.A.
215 S. Monroe Street, Ste. 701
P. O. Box 1876
Tallahassee, FL 32301

American Communications
Network Incorporated
919 Third Avenue
Suite 620
New York, NY 10022

Lynn B. Hall
Vista-United Telecommunications
3100 Bonnet Creek Road
Lake Buena Vista, FL 32830

Peter M. Dunbar, Esq.
Charles W. Murphy, Esq.
Pennington & Haben, P.A.
215 S. Monroe Street
2nd Floor
P. O. Box 10095
Tallahassee, FL 32301

Anthony P. Gillman
Kimberly Caswell
GTE Florida Incorporated
One Tampa City Center
201 N. Franklin Street
P. O. Box 110, FLTC0007
Tampa, FL 33602

Marsha Rule
Wiggins and Villacorta
501 E. Tennessee St.
Suite B
Tallahassee, FL 32302

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
501 E. Tennessee St., Suite B
Tallahassee, FL 32302

Jacksonville Teleport, L.C.
2516 Edison Avenue
Jacksonville, FL 32204-2530

Laura L. Wilson, Esq.
Charles F. Dudley, Esq.
Florida Cable
Telecommunications
Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

David B. Erwin
Young, Van Assenderp
Varnadoe & Benton, P.A.
225 S. Adams Street
Suite 200
Tallahassee, FL 32301

Charles Beck
Office of Public Counsel
House of Representatives
The Capitol
Tallahassee, FL 32301

Lee L. Willis
J. Jeffrey Wahlen
Ausley, McMullen, McGehee
Carothers & Proctor
227 S. Calhoun Street
Tallahassee, FL 32301

Alan N. Berg
United Telephone Company
Central Telephone Company
555 Lake Border Drive
Apopka, FL 32703

Timothy T. Devine
MFS Intelenet, Inc.
250 Williams Street
Suite 2200
Atlanta, GA 30303

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

Dewayne Lanier
Gulf Telephone
115 West Drew Street
Perry, FL 32347

John McGlew
Northeast Florida Telephone Company
130 N. 4th Street
MacClenny, FL 32063

Charles L. Dennis
Indiantown Telecommunications System,
Inc.
15925 S.W. Warfield Boulevard
Indiantown, FL 34956

James W. Tyler
Vista-United Telecommunications
3100 Bonnet Creek Road
Lake Buena Vista, FL 32830

John Vaughan
St. Joseph Telephone and
Telegraph Co.
502 5th Street
Port St. Joe, FL 32456

AMNEX
Regulatory Affairs
101 Park Avenue
Suite 2507
New York, NY 10178

Robin Dunson
AT&T Communications
of the Southern States, Inc. (GA)
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309-7733

Thomas Beard
Beard and Associates
5364 Appledore Lane
Tallahassee, FL 32308

BellSouth Mobility, Inc.
1100 Peachtree Street, N.E.
Suite 14-E06
Atlanta, Georgia 30309-4599

Gary T. Lawrence
City of Lakeland
501 East Lemon St.
Lakeland, FL 33801

J.D. Thomas
Cole Law Firm
1919 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Greg Krasovsky
Commerce & Economic
Opportunities
State Senate
426 Senate Office Building
Tallahassee, FL 32399

Data & Electronic Services, Inc.
P. O. Box 1585
Destin, FL 32540-1585

Carolyn Mason
Department of Management
Services
4050 Esplanade Way
Building 4030
Tallahassee, FL 32399

Nels Roseland
Office of Planning and Budget
The Capitol, Room 1502
Tallahassee, FL 32399

Bruce May
Holland Law Firm
P. O. Drawer 810
Tallahassee, FL 32302

Sam LaMartina
Independent Telecommunications
Network, Inc.
8500 W. 110th Street
Suite 600
Overland Park, KS 66210

Vice President, External Affairs
Intermedia Communications
of Florida, Inc. (TI857)
9280 Bay Plaza Blvd., Ste. 720
Tampa, Florida 33619

David Hickman
International Speedway Corp.
P. O. Box 2801
Daytona Beach, FL 32120

Don Price
MCI Telecommunications
701 Brazos, Suite 600
Austin, TX 78701

Woody Taylor
MCI Telecommunications
2400 N. Glenville Drive
Dept. 0415
Richardson, TX 75082

Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street
Room 812
Tallahassee, FL 32399

Payphone Consultants, Inc.
3431 N.W. 55th Street
Ft. Lauderdale, FL 33309

Kenneth Hoffman
Rutledge Law Firm
P. O. Box 551
Tallahassee, FL 32302

Suncoast Payphone Company
7916 Edinburgh Drive
New Port Richey, FL 34653

Margaret Weaver
Tampa Payphones, Inc.
P. O. Box 291805
Tampa, FL 33687

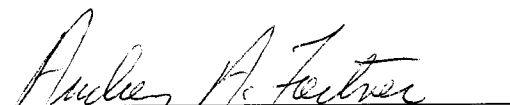
Jodie Donovan
TCG South Florida
1133 21st Street, N.W.
Suite 400
Washington, D.C. 20036

Andrew Isar
Telecommunications Reseller Assn.
4312 92nd Avenue, N.W.
Gig Harbor, WA 98335

Clay Phillips
Utilities and Telecommunications
State House
410 House Office Building
Tallahassee, FL 32399

Prentice P. Pruitt, Esq.
Gerald L. Gunter Bldg.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Monica M. Barone, Esq.
Gerald L. Gunter Bldg.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850


Audrey A. Fortner