

315  
m

LAW OFFICES  
MESSER, CAPARELLO, MADSEN, GOLDMAN & METZ  
A PROFESSIONAL ASSOCIATION

SUITE 701  
215 SOUTH MONROE STREET  
POST OFFICE BOX 1876  
TALLAHASSEE, FLORIDA 32302-1876  
TELEPHONE: (904) 222-0720  
TELECOPIERS (904) 224-4359  
(904) 425-1942

FILE COPY

December 11, 1995

Ms. Blanca Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
Room 110, Easley Building  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

**HAND DELIVERY**

Re: Docket No. 950984-TP

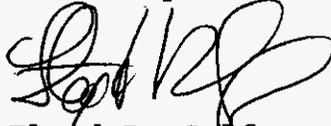
Dear Ms. Bayo:

Enclosed for filing are an original and 15 copies of LDDS WorldCom Communications' Prehearing Statement in the above-referenced docket. Also enclosed is a 3 1/2" diskette in WordPerfect 6.1 format with the document on it called "LDDSPHG."

Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

Your attention to this filing is appreciated.

Sincerely,

  
Floyd R. Self

FRS/amb  
Enclosures  
cc: Mr. Brian Sulmonetti  
Parties of Record

ACK ✓  
AFA  
BFA  
CFA  
DFA  
EFA  
GFA  
HFA  
IFA  
JFA  
KFA  
LFA  
MFA  
NFA  
OFA  
PFA  
QFA  
RFA  
SFA  
TFA  
UFA  
VFA  
WFA  
XFA  
YFA  
ZFA  
GTH



DOCUMENT NUMBER-DATE  
12445 DEC 11 95  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petitions)  
to Establish Nondiscriminatory)  
Rates, Terms, and Conditions )  
for Resale Involving Local )  
Exchange Companies and )  
Alternative Local Exchange )  
Companies )  
\_\_\_\_\_)

Docket No.950984-TP  
Filed: December 11, 1995

**PREHEARING STATEMENT OF  
LDDS WORLDCOM COMMUNICATIONS**

WORLDCOM, INC. d/b/a LDDS WORLDCOM COMMUNICATIONS ("LDDS  
WORLDCOM"), pursuant to the requirements of Order No. PSC-95-1083-  
PCO-TP, respectfully submits its prehearing statement.

**APPEARANCES**

Floyd R. Self, Esq. and Norman H. Horton, Jr., Esq.  
Messer, Caparello, Madsen, Goldman & Metz, P.A.  
Post Office Box 1876  
Tallahassee, FL 32302-1876

**A. WITNESSES**

LDDS WorldCom does not intend to call any witnesses, but  
reserves the right to call witnesses, if necessary, as may be  
required by later filed testimony, completion of discovery, or new  
issues identified at the prehearing conference.

DOCUMENT NUMBER-DATE

12445 DEC 11 95

FPSC-RECORDS/REPORTING 172

## B. EXHIBITS

LDDS WorldCom does not intend to present any exhibits, but reserves the right to introduce exhibits, if necessary, as may be required by cross examination, later filed testimony, completion of discovery, or new issues identified at the prehearing conference.

## C. BASIC POSITION

The Commission should recognize that the creation of end-to-end wholesale network arrangements are paramount to the development of meaningful local competition. Thus, in approving the pending requests, the Commission should recognize that other carriers may have different unbundling and resale requirements that would necessitate different wholesale local service arrangements.

## D. ISSUES AND POSITIONS

**Issue 1: What elements should be made available by BellSouth to MCImetro and MFS on an unbundled basis (e.g. link elements, port elements, loop concentration, loop transport)?**

LDDS WORLDCOM'S POSITION: The requested unbundling and resale requests should be granted. However, in approving these requests, the Commission should recognize that because each competitor's service requirements may be different, the unbundled components approved in this proceeding may be insufficient or inappropriate for other competitors.

**Issue 2: What are the appropriate technical arrangements for the provision of such unbundled elements?**

LDDS WORLDCOM'S POSITION: The technical arrangements requested should be approved.

**Issue 3: What are the appropriate financial arrangements for each such unbundled element?**

LDDS WORLDCOM'S POSITION: The pricing of the unbundled elements should be based on the direct economic cost of the wholesale component purchased.

**Issue 4: What arrangements, if any, are necessary to address other operational issues?**

LDDS WORLDCOM'S POSITION: The Commission should recognize that other carriers may have different unbundling and resale requirements that may require further proceedings. At a minimum, the Commission should direct the LECs to provide nondiscriminatory automated operational support mechanisms to facilitate the purchase of all elements of the wholesale local network platform.

#### **E. STIPULATIONS**

There have not been any issues stipulated at this time.

#### **F. PENDING MOTIONS**

LDDS WorldCom's Petition for Intervention is pending. LDDS WorldCom does not have any other motions pending.

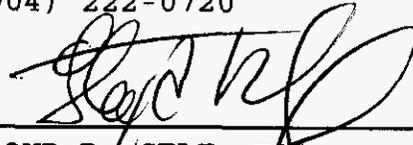
**G. COMPLIANCE WITH OTHER REQUIREMENTS**

LDDS WorldCom is unaware of any other requirements of the prehearing order that cannot be complied with.

Dated this 11th day of December, 1995.

Respectfully submitted,  
MESSER, CAPARELLO, MADSEN, GOLDMAN &  
METZ, P.A.

Post Office Box 1876  
Tallahassee, FL 32302-1876  
(904) 222-0720



---

FLOYD R. SELF, ESQ.  
NORMAN H. HORTON, JR., ESQ.

Attorneys for LDDS WorldCom, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of LDDS WorldCom's Prehearing Statement in Docket No. 950984-TP has been furnished by Hand Delivery (\*) and/or U. S. Mail on this 11th day of December, 1995 to the following parties of record:

Donna Canzano, Esq.\*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Jack Shreve  
Office of the Public Counsel  
111 W. Madison St., Room 812  
Tallahassee, FL 32399-1400

David B. Erwin  
Young Van Assenderp et al.  
225 S. Adams Street, Suite 200  
Tallahassee, FL 32301

Mr. Randolph Fowler  
Alternet  
c/o Hyperion Telecommunications,  
Inc.  
2570 Boyce Plaza Road  
Pittsburg, PA 15241

City of Lakeland  
501 East Lemon Street  
Lakeland, FL 33801-5079

Ms. Leslie Carter  
Digital Media Partners  
1 Prestige Place, Suite 255  
2600 McCormick Drive  
Clearwater, FL 34619-1098

Patricia Kurlin, Esq.  
Intermedia Communications of  
Florida, Inc.  
9280 Bay Plaza Blvd., Suit e720  
Tampa, FL 33619-4453

Mickey Henry  
MCI Metro Access Transmission  
Services, Inc.  
780 Johnson Ferry Road  
Atlanta, GA 30342

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

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

Mr. Richard Gerstemeier  
Time Warner AxS of Florida, L.P.  
2251 Lucien Way, Suite 320  
Maitland, FL 32751-7023

WinStar Wireless of Florida, Inc.  
7799 Leesburg Park South, Suite 401  
Tyson's Corner, VA 22043

Richard Melson, Esq.  
Hopping Law Firm  
P.O. Box 6526  
Tallahassee, FL 32314

Mr. Richard H. Brashear  
ALLTEL Florida, Inc.  
P.O. Box 550  
Live Oak, FL 32060-0550

Mr. P. J. Merkle  
Sprint/United - Florida  
P.O. Box 165000  
Altamonte Springs, FL 32716-5000

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

Ms. Beverly Menard  
GTE Florida, Inc.  
c/o Mr. Richard M. Fletcher  
106 E. College Avenue, Suite 1440  
Tallahassee, FL 32301-7704

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

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

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

Michael W. Tye, Esq  
106 East College Ave.  
Suite 1410  
Tallahassee, Florida 32301

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

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

Ms. Nancy H. Sims  
Southern Bell Telephone and  
Telegraph Co.  
150 S. Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

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

Mr. Ferrin Seay  
Floralata Telephone Company, Inc.  
P.O. Box 186  
Floralata, AL 36442-0186

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

Mr. Timothy Devine  
MFS Communications Company,  
Inc.  
250 Williams St., Suite 2200  
Atlanta, GA 30303-1034

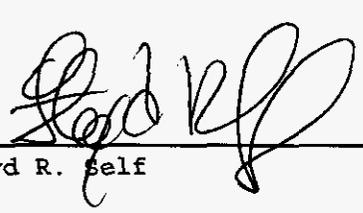
Richard M. Rindler  
James C. Falvey  
Swidler & Berlin, Chartered  
3000 K St., N.W., Suite 300  
Washington, DC 20007

Patrick K. Wiggins  
Wiggins & Villacorta, P. A.  
Post Office Drawer 1657  
Tallahassee, Florida 32302

Laura L. Wilson  
Vice President, Regulatory Affairs  
and Regulatory Counsel  
Florida Cable Telecommunications  
Association  
310 N. Monroe St.  
Tallahassee, FL 32301

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs, Odom & Ervin  
P.O. Drawer 1170  
Tallahassee, FL 32302

Benjamin Fincher, Esq.  
Sprint Communications Company, L.P.  
3065 Cumberland Circle  
Atlanta, GA 30339

By:   
Floyd R. Self