

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL FILED

In Re: Resolution of Petition(s))	Docket No. 950985-TP
to Establish Nondiscriminatory)	Filed: December 22, 1995
Rates, Terms, and Conditions for)	
Interconnection Involving Local)	
Exchange Companies and Alternative)	
Local Exchange Companies Pursuant)	
to Section 364.162, Florida Statutes)	

TIME WARNER AXS OF FLORIDA, L.P.
AND DIGITAL MEDIA PARTNERS
JOINT PETITION TO ESTABLISH NONDISCRIMINATORY RATES,
TERMS, AND CONDITIONS FOR INTERCONNECTION WITH
SPRINT/UNITED AND DIRECT TESTIMONY OF JOAN MCGRATH,
DON J. WOOD AND DANNY G. ENGLEMAN

COMES NOW, Time Warner AxS of Florida, L.P. ("Time Warner") and Digital Media Partners ("DMP") (collectively "Time Warner/DMP"), pursuant to Rule 25-22.036, F.A.C., Section 364.162, Florida Statutes, and the Order Establishing Procedure, and jointly file their Petition to Establish Nondiscriminatory Rates, Terms, and Conditions for Interconnection with Sprint/United--Florida ("Sprint/United") and the Direct Testimony of Joan McGrath, Don J. Wood and Danny G. Engleman. In support thereof, Time Warner/DMP state the following:

A. The names and addresses of the persons to whom copies of all correspondence, notices, orders and other documents in this proceeding should be sent are as follows:

Peter M. Dunbar, Esq.	Ms. Jill Butler
Charles W. Murphy, Esq.	Florida Regulatory Director
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FPSC-RECORDS/REPORTING

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B. The address for Time Warner is 2251 Lucien Way, Suite 320, Maitland, Florida 32751.

C. Time Warner filed a notice of intent to provide alternative local exchange telecommunications services with the Commission on August 1, 1995. Time Warner is the holder of Alternative Local Exchange Certificate No. 3167 and is authorized to provide ALEC services beginning January 1, 1996.

D. The address for DMP is 1 Prestige Place, Suite 255, 2600 McCormack Drive, Clearwater, Florida 34619-1098.

E. DMP filed a notice of intent to provide alternative local exchange telecommunications services with the Commission on August 1, 1995. DMP is the holder of Alternative Local Exchange Certificate No. 3135 and is authorized to provide ALEC services beginning January 1, 1996.

F. Time Warner/DMP require an agreement establishing acceptable rates, terms, and conditions for interconnection with the Sprint/United before Time Warner/DMP can enter the local exchange market.

G. Pursuant to Section 364.162, Florida Statutes, if interconnection negotiations are unsuccessful, after 60 days either party may petition the Commission to establish nondiscriminatory rates, terms, and conditions.

H. Time Warner/DMP and Sprint/United have conducted interconnection negotiations for more than 60 days.

I. To date, Time Warner/DMP and Sprint/United have been unable to reach a comprehensive written agreement establishing the rates, terms, and conditions for interconnection of their respective networks.

J. While there does not appear to be disagreement on every aspect of interconnection, absent a written agreement between Time Warner/DMP and Sprint/United, Time Warner/DMP believes that the Commission must resolve the following issues:

1. What are the appropriate rate structures, interconnection rates, or other compensation arrangements for the exchange of local and toll traffic between Time Warner/DMP and Sprint/United?
2. If the Commission sets rates, terms, and conditions for interconnection between Time Warner/DMP and Sprint/United, should Sprint/United tariff the interconnection rate(s) or other arrangements?
3. What are the appropriate technical and financial arrangements which should govern interconnection between Time Warner/DMP and Sprint/United for the delivery of calls originated and/or terminated from carriers not directly connected to the Time Warner/DMP networks?
4. What are the appropriate technical and financial requirements for the exchange of intraLATA 800

traffic which originates from Time Warner/DMP's customer and terminates to an 800 number served by or through Sprint/United?

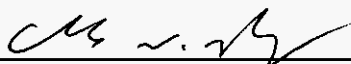
- 5a. What are the appropriate technical arrangements for the interconnection of Time Warner/DMP's networks to Sprint/United's 911 provisioning networks such that Time Warner/DMP's customers are ensured the same level of 911 service as they would receive as a customer of Sprint/United?
- 5b. What procedures should be in place for the timely exchange and updating of Time Warner/DMP's customer information for inclusion in appropriate E911 databases?
6. What are the appropriate technical and financial requirements for operator handled traffic flowing between Time Warner/DMP and Sprint/United including busy line verification and emergency interrupt services?
7. What are the appropriate arrangements for the provision of directory assistance services and data between Time Warner/DMP and Sprint/United?
8. Under what terms and conditions should Sprint/United be required to list Time Warner/DMP's customers in its white and yellow pages directories and to publish and distribute these directories to Time Warner/DMP's customers?

9. What are the appropriate arrangements for the provision of billing and collection services between Time Warner/DMP and Sprint/United, including billing and clearing credit card, collect, third party and audiotext calls?
10. What arrangements are necessary to ensure the provision of CLASS/LASS services between Time Warner/DMP's and Sprint/United's networks?
11. What are the appropriate arrangements for physical interconnection between Time Warner/DMP and Sprint/United, including trunking and signalling arrangements?
12. To the extent not addressed in the number portability docket, Docket No. 950737-TP, what are the appropriate financial and operational arrangements for interexchange calls terminated to a number that has been "ported" to Time Warner/DMP?
13. What arrangements, if any, are necessary to address other operational issues?
14. What arrangements, if any, are appropriate for the assignment of NXX codes to Time Warner/DMP?

K. Time Warner/DMP's positions regarding the foregoing issues are set forth more fully in the direct testimony of Joan McGrath, Don J. Wood and Danny G. Engleman which are attached to this petition.

WHEREFORE Time Warner AxS of Florida, L.P. and Digital Media Partners respectfully request the Florida Public Service Commission to set nondiscriminatory rates, terms, and conditions for interconnection of the Time Warner/DMP and Sprint/United networks.

RESPECTFULLY SUBMITTED this 22nd day of December, 1995.


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CERTIFICATE OF SERVICE
DOCKET NO. 950985-TP

I HEREBY CERTIFY that a true and correct copy of Time Warner AxS of Florida, L.P.'s and Digital Media Partners Joint Petition to Establish Nondiscriminatory Rates, Terms, and Conditions for Interconnection between Time Warner/DMP and Sprint/United and the Direct Testimony of Joan McGrath, Don J. Wood and Danny G. Engleman has been served by either *Federal Express or Hand Delivery on this 22nd day of December, 1995, to the following parties of record:

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