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Ms. Blanca S. Bayó Director, Records & Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Docket No. 950984-TP (Sprint/GTEFL)

(Unbundling)

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Metro Access Transmission Services, Inc. (MCImetro) in the above referenced docket are the original and 15 copies of MCImetro's Prehearing Statement, togther with a WordPerfect 5.1 disk.

By copy of this letter this document has been provided to the parties on the attached service list.

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish nondiscriminatory rates,)
terms, and conditions for)
resale involving local)
exchange companies and alternative)
local exchange companies pursuant to)
Section 364.161, Florida Statutes.

Docket No. 950984-TP (Sprint/GTEFL Phase)

Filed: February 20, 1996

MCI METRO ACCESS TRANSMISSION SERVICES, INC.'S PREHEARING STATEMENT

MCI Metro Access Transmission Services, Inc. (MCImetro) hereby submits its Prehearing Statement in the phase of the above-captioned docket relating to petitions filed against Sprint-United and Sprint-Centel ("Sprint" or "United/Centel") and GTE Florida Incorporated (GTEFL).

A. <u>Known Witnesses</u>. MCImetro has prefiled the testimony of the following witnesses:

<u>Witness</u>	<u>Testimony</u>	<u>Issues</u>
Dr. Nina Cornell	Direct (2/7/96) Rebuttal (2/21/96)	1-3

B. <u>Known Exhibits</u>. MCImetro has the following direct exhibits. MCImetro reserves the right to use additional exhibits for the purpose of cross-examination.

Cornell Direct NWC-1 Academic and Professional Qualifications of Dr. Nina Cornell

C. <u>Basic Position</u>. United/Centel and GTEFL should make unbundled local loops, loop transport, and loop concentration available to MFS-FL at prices equal to their total service long

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run incremental cost. The unbundling of such elements is technically and economically feasible. Such elements should be priced equal to their direct economic cost (i.e. TSRLIC) in order to prevent the possibility of price squeezes.

D-G. <u>Issues</u>. MCImetro's positions on the issues identified in Order No. PSC-96-0213-PCO-TP are as follows:

- Issue 1. What elements should be made available by United/Centel and GTEFL to MFS-FL on an unbundled basis (e.g. link elements, port elements, loop concentration, loop transport)?
- MCImetro: United/Centel and GTEFL should make available to MFS-FL unbundled loops, loop concentration and loop transport. The unbundling of such elements is technically and economically feasible. In addition, United/Centel and GTEFL should make available, upon request, any other element that it is technically and economically feasible to unbundle, including the additional elements requested by MFS.
- <u>Issue 2</u>. What are the appropriate technical arrangements for the provision of such unbundled elements?
- MCImetro: Unbundled loops should be provided from the customer's premises to United/Centel and GTEFL's central office and interconnectioned, at the MFS-FL's option, to (i) MFS-FL's co-located facilities, (ii) the co-located facilities of another carrier, or (iii) loop transport facilities provided by United/Centel and GTEFL. Loop transport should be provided to transport traffic to or from the United/Centel and GTEFL central office to the point of interconnection with MFS-FL, if not co-located at United/Centel and GTEFL's central office (e.g. to a mid-span meet or to an MFS-FL entrance facility at another central office or access tandem). Loop concentration should be provided to maximize the efficiency with which traffic is delivered through tranport facilities.
- <u>Issue 3</u>. What are the appropriate financial arrangements for the provision of each such unbundled element?
- MCImetro: The price of each such unbundled element should be set equal to its direct economic cost, i.e. its total service long run incremental cost.

<u>Issue 4</u>. What arrangements, if any, are necessary to address other operational issues?

MCImetro: United/Centel and GTEFL should provide order entry, repair, testing, and any other administrative systems required for the provision of unbundled facilities, on a mechanized basis.

- H. <u>Stipulations</u>. MCImetro is not aware of any stipulations in this phase of the docket.
- I. <u>Pending Motions</u>. MCImetro has no pending motions that require action by the Commission.
- J. <u>Requirements of Order</u>. MCImetro believes this prehearing statement is fully responsive to the requirements of the Order on Prehearing Procedure.

RESPECTFULLY SUBMITTED this 20th day of February, 1996.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by hand delivery (**) or next business day delivery by UPS (*) this 20th day of February, 1996.

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