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Florida Cable Telecommunications Association

Steve Wilkerson, President

February 20, 1996

ORIGINAL
FILE COPY

VIA HAND DELIVERY

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

RE: **DOCKET NO. 950985-TP; MFS PETITIONS AGAINST SPRINT-UTF/CF AND GTEFL**

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are an original and fifteen (15) copies of Florida Cable Telecommunications Association, Inc.'s ("FCTA") Prehearing Statement. Copies have been served on the parties of record pursuant to the attached certificate of service.

Also enclosed is a copy on a 3-1/2" diskette in WordPerfect format, version 5.1.

Please acknowledge receipt and filing of the above by date stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing.

Yours very truly,

- ACK Laura L. Wilson
- AFA _____
- APP _____
- CAF _____
- CMU Enclosures
- CTR _____
- EAG _____
- LEG 1
- LIN 5
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

cc: All Parties of Record
Mr. Steven E. Wilkerson

Man

310 North Monroe Street • Tallahassee, Florida 32301 • (904) 681-1990 FAX (904) 681-9676

DOCUMENT NUMBER - DATE

02032 FEB 20 96

FPSC - RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition(s) to establish)
non-discriminatory rates, terms and)
conditions for interconnection involving)
local exchange companies and alternative)
local exchange companies pursuant to)
Section 364.162, Florida Statutes)
_____)

DOCKET NO. 950985-TP
MFS Subdocket

FILED: February 20, 1996

FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION, INC.'S
PREHEARING STATEMENT

The Florida Cable Telecommunications Association, Inc. ("FCTA") pursuant to Rule 25-22.056, Florida Administrative Code, respectfully submits to the Florida Public Service Commission ("Commission") its Prehearing Statement in the above-captioned docket.

A. WITNESSES

FCTA will present Mr. Joseph P. Cresse as a witness. His testimony will address Issue Nos. 1 and 2. He will present direct and rebuttal testimony on these issues.

FCTA reserves the right to call additional witnesses, if necessary, as may be required by later filed testimony, the completion of discovery, or new issues identified at the prehearing conference.

B. EXHIBITS

FCTA intends to present the following exhibits:

1. Exhibit No. ____ (JPC-1) Resume of Joseph P. Cresse.
2. Exhibit No. ____ (JPC-2) Terminating Switched Access Rate Elements.
3. Exhibit No. ____ (JPC-3) Transcript of March 22, 1995 House Subcommittee on Telecommunications Meeting.

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FCTA reserves the right to later identify and sponsor such exhibits as may be required by late filed testimony, the completion of discovery, or new issues identified at the prehearing conference.

C. BASIC POSITION

The appropriate compensation arrangement between ALECs and Sprint-United/Centel or GTEFL is a bill and keep arrangement. This is the model used for terminating traffic between the facilities-based incumbent LECs in Florida today. The Sprint-United\Centel and GTEFL proposals based upon their switched access rate elements will stifle full competition.

D. ISSUES AND POSITIONS

FCTA offers the following prehearing positions on the questions of law, fact and public policy identified for disposition in this docket:

ISSUE 1: What is (are) the appropriate rate structures interconnection rate(s), or other compensation arrangements for the exchange of local and toll traffic between the ALECs and Sprint-United/Centel and GTEFL?

POSITION: The appropriate local interconnection arrangement is a bill and keep arrangement.

ISSUE 2: If the Commission sets the rates, terms, and conditions for interconnection between the respective ALECs and Sprint-United/Centel and GTEFL, should Sprint-United/Centel and GTEFL tariff the interconnection rates(s) or other arrangements?

POSITION: Yes.

ISSUE 3: What are the appropriate technical and financial arrangements which should govern interconnection between the ALECs and Sprint-United/Centel and GTEFL for the delivery of calls originated and/or terminated from carriers not directly connected to the respective ALECs' network?

POSITION: Sprint-United/Centel and GTEFL should provide intermediary tandem switching and transport to connect an ALEC's end user to the end user of another ALEC, a LEC other than Sprint-United/Centel or GTEFL, or wireless telecommunications service providers, for the purpose of making local and toll calls.

ISSUE 4: What are the appropriate technical and financial requirements for the exchange of intraLATA 800 traffic which originates from the ALECs' customer and terminates to an 800 number served by or through Sprint-United/Centel and GTEFL?

POSITION: Sprint-United/Centel and GTEFL should compensate an ALEC for the origination of 800 traffic terminated to Sprint-United/Centel and GTEFL pursuant to the ALEC's originating switched access charges. The ALEC will provide to Sprint-United/Centel and GTEFL the appropriate records necessary for Sprint-United/Centel and GTEFL to bill their customers. At such time as the ALEC elects to provide 800 services, the ALEC should reciprocate this arrangement.

ISSUE 5: (a) What are the appropriate technical arrangements for the interconnection of the ALECs' network to Sprint-United/Centel's and GTEFL's 911 provisioning networks such that the ALECs' customers are ensured the same level of 911 service as they would receive as a customer of Sprint-United/Centel and GTEFL?

POSITION: An ALEC's customers must have the same level of access to reliable 911 service as the LEC providers. For basic 911 service, Sprint-United/Centel and GTEFL should provide a list consisting of each municipality in Florida that subscribes to Basic 911 service. The list will also provide E911 conversion date and, for network routing purposes, a ten-digit directory number representing the appropriate emergency answering position for each municipality subscribing to Basic 911 service. Each ALEC should arrange to accept 911 calls from its customers in municipalities that subscribe to Basic 911 service and translate the 911 call to the appropriate 10-digit directory number as stated on the list provided by Sprint-United/Centel and GTEFL and route the call to the LEC at the appropriate tandem or end office. When a municipality converts to E911 service, the ALEC should be required to discontinue the Basic 911 procedures and begin the E911 procedures.

For E911 service, the ALEC should connect Feature Group D trunks to the appropriate E911 tandem, including the designated secondary tandem. If a municipality has converted to E911 service, the ALEC should forward 911 calls to the appropriate 911 primary tandem, along with ANI, based upon the current E911 end office to tandem homing arrangement as provided by Sprint-United/Centel and GTEFL. If the primary tandem trunks are not available, the ALEC should alternate route the call to the designated secondary E911 tandem. If the secondary tandem trunks are not available, the ALEC should alternate route the call to the appropriate Traffic Operator Position System (TOPS) tandem.

(b) What procedures should be in place for the timely exchange and updating of ALECs' customer information for inclusion in appropriate E911 databases?

POSITION: In order to ensure the proper working of the system along with accurate customer data, the ALEC should provide daily updates to the E911 database. Sprint-United/Centel and GTEFL must be required to work cooperatively with the ALEC to define record layouts, media requirements, and other written procedures for this process.

ISSUE 6: What are the appropriate technical and financial requirements for operator handled traffic flowing between the respective ALECs and Sprint-United/Centel and GTEFL, including busy line verification and emergency interrupt services?

POSITION: A LEC and an ALEC should mutually provide each other busy line verification and emergency interrupt services. Sprint-United/Centel's and GTEFL's services should be tariffed.

ISSUE 7: What are the appropriate arrangements for the provision of directory assistance services and data between the respective ALECs and Sprint-United/Centel and GTEFL?

POSITION: Each LEC should include an ALEC's customers' primary listings (residence and business listings) and yellow page (business) listings in its directory assistance database at no charge.

ISSUE 8: Under what terms and conditions should Sprint-United/Centel and GTEFL be required to list the ALECs' customers in its white and yellow pages directories and to publish and distribute these directories to ALECs' customers?

POSITION: The LEC should include an ALEC's customers' primary listings in the white page and yellow page directories, distribute directories to the customers of each and recycle all customers' directory books at no charge. Sprint-United/Centel, GTEFL and the ALEC should work cooperatively to develop agreements concerning lead time, timeliness, format, and content of list information.

ISSUE 9: What are the appropriate arrangements for the provision of billing and collection services between the respective ALECs and Sprint-United/Centel and GTEFL, including billing and clearing credit card, collect third party and audiotext calls?

POSITION: FCTA takes no position at this time.

ISSUE 10: What arrangements are necessary to ensure the provision of CLASS/LASS services between the respective ALECs and Sprint-United/Centel's and GTEFL's networks?

POSITION: The LECs and each ALEC should provide LEC-to-LEC Common Channel Signalling (CCS) to one another, where available, in conjunction with all traffic in order to enable full interoperability of CLASS features and functions. All CCS signalling parameters should be provided including Automatic Number Identification (ANI), Originating Line Information (OLI) calling party category, charge number, etc. All privacy indicators should be honored. The parties should cooperate on the exchange of Transactional Capabilities Application Point (TCAP) messages to

facilitate full interoperability of CCS-based features between their networks. CCS should be provided Signal Transfer Point to Signal Transfer Point.

ISSUE 11: What are the appropriate arrangements for physical interconnection between the respective ALECs and Sprint-United/Centel and GTEFL, including trunking and signalling arrangements?

POSITION: Reciprocal connectivity should be established at each and every point where the facilities of Sprint-United/Centel and GTEFL and the ALEC perform the physical function of delivering local traffic to be terminated in the other company's network. Such interconnecting facilities should conform to appropriate telecommunications industry standards. STP SS7 Signalling connectivity is required. Use of the LEC's signalling network should be offered on an unbundled basis at tariffed rates and signalling functionality should be available with both A-link and B-link connectivity.

ISSUE 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 the ALECs?

POSITION: The ALECs should receive all the access revenues.

ISSUE 13: What arrangements, if any, are necessary to address other operational issues?

POSITION: Arrangements should be made for cooperative network design and management procedures.

ISSUE 14: What arrangements, if any, are appropriate for the assignment of NXX codes to the respective ALECs?

POSITION: ALECs should have access to a sufficient quantity of numbering resources on a nondiscriminatory basis. The LECs should agree to sponsor any ALEC which makes a request and assist the ALEC in obtaining RAO codes and any other billing and accounting codes necessary for the provision of local phone numbers within each LEC territory.

E. STIPULATIONS

FCTA has not stipulated to any matters with Sprint-United/Centel or GTEFL at this time.

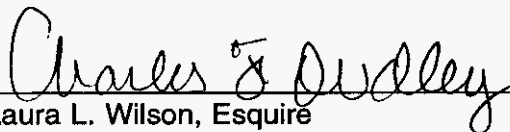
F. MOTIONS

FCTA has no motions pending at this time.

G. OTHER REQUIREMENTS

There are no requirements of the procedural order that FCTA is unable to comply with.

RESPECTFULLY SUBMITTED this 20th day of February, 1996.



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CERTIFICATE OF SERVICE
DOCKET NO 950985-TP

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by Hand Delivery(*) and/or U. S. Mail on this 20th day of February, 1996 to the following parties of record:

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