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August 30, 1996

Via Overnight Delivery

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

1160919-TP

96 SEP - 3 11:11

Re: Erratum - WinStar Wireless of Florida, Inc. Petition for Arbitration Pursuant to 47 USC Section 252(b) of Interconnection Rates, Terms, and Conditions with GTE Florida Incorporated

Dear Ms. Bayo:

Enclosed for filing on behalf of WinStar Wireless of Florida, Inc. ("WinStar") please find an original and 15 copies of an Erratum and corrected testimonial page. The original testimonial page submitted on August 23, 1996, inadvertently and incorrectly listed GTE-Georgia as a company with whom WinStar has entered into an interconnection agreement. Please substitute the enclosed corrected testimonial page for the testimonial page originally submitted on August 23, 1996. We apologize for any inconvenience, and appreciate your assistance. Please date stamp the extra copy and return the same in the enclosed self-addressed, stamped envelope.

Also enclosed is a computer disk formatted in WordPerfect 6.1 for Windows containing Robert G. Berger's corrected testimony in its entirety.

If there are any questions concerning this matter, please do not hesitate to contact the undersigned.

Sincerely,

Dana Erix

Dana Erix
Kathy L. Cooper
Counsel for
WinStar Wireless of Florida, Inc.

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5

Enclosures

12/24/96

DOCUMENT NUMBER-DATE

09267 SEP-3

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RECORDS/REPORTING

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of)
)
WINSTAR WIRELESS OF FLORIDA, INC.)
)
Petition for Arbitration Pursuant to)
47 U.S.C. 252(b) of Interconnection Rates,)
Terms, and Conditions with)
)
GTE FLORIDA INCORPORATED)

Docket No. *960979-TP*

ERRATUM

On August 23, 1996, WinStar Wireless of Florida, Inc. ("WinStar"), by its counsel, filed a Petition for Arbitration of Interconnection Rates, Terms and Conditions. After the filing was made, counsel for WinStar discovered that page 5 of the submitted testimony of Robert G. Berger attached as Exhibit F to the Petition incorrectly listed GTE-Georgia as a company with which WinStar had entered into an interconnection agreement. Attached hereto is a corrected page 5.

Respectfully submitted,



Dana Frix
Kathy L. Cooper

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Counsel for WinStar Wireless of Florida, Inc.

Dated: August 30, 1996

1 nondiscriminatory treatment, which are critical to WinStar given its 38 GHz
2 technology and corporate size.

3 **Q. HAS WINSTAR REACHED ANY INTERCONNECTION AGREEMENTS**
4 **WITH CARRIERS?**

5 A. Yes. WinStar has entered into interconnection agreements with GTE's sister
6 company, GTE-California, as well as Pacific Bell (for California), Ameritech (for
7 Illinois), NYNEX (for both New York and Massachusetts) and BellSouth (for all
8 nine states in the BellSouth region).

9 **II. UNRESOLVED ISSUES**

10 **A. MOST FAVORED NATION PROTECTION**

11 **Q. WHY SHOULD WINSTAR BE AFFORDED MOST FAVORED NATION**
12 **PROTECTION?**

13 A. Section 252(i) of the 1996 Act requires that a LEC "make available any
14 interconnection service or network element provided under an agreement . . . to
15 which it is a party to any other requesting telecommunications carrier upon the
16 same terms and conditions as those provided in the agreement." In its
17 *Interconnection Order (see In the Matter of Implementation of the Local*
18 *Competition Provisions in the Telecommunications Act of 1996, FCC Docket No.*
19 *96-98 (rel. Aug. 8, 1996))* implementing the interconnection provisions of the
20 1996 Act, the FCC held (at paragraph 1316) that Section 252(i) of the Act

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of August, 1996 a copy of the foregoing was served,

via prepaid first-class mail on the following:

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Wendy Mills