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Florida Cable Telecommunications Association

Steve Wilkerson, President

November 25, 1996

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: DOCKET NO. 920260-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are an original and fifteen copies of an Amended Page 6 of Florida Cable Telecommunications Association, Inc.'s Posthearing brief filed on November 20, 1996 in the above-referenced docket.

The Amended Page 6 corrects two clerical errors on the original page 6 of the brief. These clerical errors are as a result of a miscommunication while counsel for FCTA was out of the office on business.

Please substitute the Amended Page 6 for the original page 6 in the posthearing brief. FCTA regrets any inconvenience that this causes. Copies of this filing have been served on the parties of record.

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 on this matter.

Yours very truly,

Laura L. Wilson

Enclosures

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU Norton
- CTR _____
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- RCH _____
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- WAS _____
- OTH _____

Laura L. Wilson

12576-96

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The ALECs have discovered this barrier to entry through experience in the marketplace. In the Orlando LATA, for example, Time Warner was recently forced to order a total of eight trunk groups to the two BellSouth tandems. The eight trunk groups contained a total of 292 trunks. Non-recurring trunk charges alone for this piece of local interconnection totaled \$83,590. BellSouth, on the other hand, only forced itself to order one trunk group from Time Warner consisting of 144 trunks. With total non-recurring charges of \$38,524.

Even assuming that traffic is in balance, the non-recurring charges alone that an ALEC incurs for just two collocations in Orlando are more than double the charges that BellSouth incurs. If competition is to become a reality in Florida, ALECs will require interconnection in multiple BellSouth LATAs and central offices. BellSouth's non-recurring charges and the manner in which they are levied quickly become costly barriers to the rapid development of local competition and can only lead ALECs to reassess early entry decisions to collocate in multiple BellSouth central offices.

BellSouth's non-recurring charges are in appropriate for other reasons. The charges perpetuate BellSouth's position that ALECs should be treated as access customers. This is a position that the Commission has previously considered and rejected in Docket No. 950984-TP. Order No. PSC-96-0811-FOF-TP at 17 (ALECs are a different class of customer than IXC's). Moreover, the plain language of Chapter 364 clearly distinguishes local interconnection from network access services. See i.e., Section 364.163 introductory paragraph.

Because the non-recurring charges deter competition and inappropriately treat ALECs as access customers, the Commission should take this opportunity to eliminate or reduce the charges. BellSouth was unable or unwilling to specify the amount of rate reductions this proposal utilizes despite the efforts of FCTA and Commission Staff to obtain this information in discovery. However, the following provides a reasonable estimate of the impact on Bellsouth.

Amended p. 6

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