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September 7, 2000

BY HAND DELIVERY

Blanca Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket No. 000649-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCImetro Access Transmission Services, LLC and MCI WORLDCOM Communications, Inc. (collectively "WorldCom") are the original and fifteen copies of their Prehearing Statement. Also, enclosed is a diskette for your convenience.

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

Very truly yours,

Richard D. Melson

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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of MCImetro Access }
Transmission Services, LLC and }
MCI WorldCom Communications, Inc. for }
Arbitration of Certain Terms and } Docket No. 000649-TP
Conditions of Proposed Agreement with }
BellSouth Telecommunications, Inc. } Filed: September 7, 2000
Concerning Interconnection and Resale }
Under the Telecommunications Act of 1996 }

WORLDCOM'S PREHEARING STATEMENT

MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. (collectively, "WorldCom") file this prehearing statement in compliance with the requirements of Order No. PSC-00-1324-PCO-TP, issued July 21, 2000, and Order No. PSC-00-1560-PCO-TP, issued August 30, 2000.

A. Known Witnesses. WorldCom has prefiled the testimony of the following witnesses:

<u>Witness</u>	<u>Issues</u>
Don Price Direct and Rebuttal	1-3, 6, 7A, 9, 18, 22, 23, 28, 29, 39, 40, 42, 45-47, 51, 53, , 67, 68, 75, 92-97, 99-102, 107-111
Lee Olson Direct and Rebuttal	32-34, 36-37, 53A
Michael S. Messina Direct and Rebuttal	5, 8, 11, 15, 19, 54, 56, 59-61, 63-66, 66D
Sherry Lichtenberg Direct and Rebuttal	80, 81, 90-91, 96A
Marsha Emch Direct	105

DOCUMENT NUMBER-DATE

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B. Known Exhibits: WorldCom has prefiled the following exhibits:

Exhibit A to Petition	_____	WorldCom's Agreement with BellSouth regarding Negotiation of Florida Interconnection Agreements
Exhibit B to Petition	_____	Matrix of Unresolved Issues
Exhibit C to Petition	_____	Proposed Interconnection Agreement
Price	DP-1	Rate Centers Served by WorldCom Switches and BellSouth Local Tandems
Price	DP-2	Proposed Language regarding Line Sharing

WorldCom reserves the right to use additional exhibits for purposes of cross-examination.

C. Basic Position. In this docket the Commission will determine many of the terms and conditions of the parties' interconnection agreements that will be in effect for the next three years. The parties have been able to resolve some of the issues raised in WorldCom's arbitration petition, but many the unresolved issues still must be addressed. WorldCom submits that its proposed resolution of the issues below is consistent with the Telecommunications Act of 1996 and the public policy goal of promoting competition in the local telephone exchange

market in Florida. WorldCom therefore respectfully requests that each of the issues below be resolved in its favor.

D.-F. Issues and Positions. The following are WorldCom's positions on the issues that were raised in its petition, as reflected in the Order on Procedure.

Issue 1: Should the electronically ordered NRC apply in the event an order is submitted manually when electronic interfaces are not available or not functioning within specified standards or parameters?

WCOM: No. When BellSouth provides an electronic interface to itself, but fails to provide an electronic interface to WorldCom, BellSouth should not be able to impose a manual ordering charge.

Issue 2: What prices should be included in the Interconnection Agreements?

WCOM: The Commission should establish the UNE rates proposed by WorldCom in Attachment 1 on an interim basis subject to true-up. Once the FPSC establishes permanent rates for UNEs in Docket No. 990649-TP, those rates should be included in the Interconnection Agreements.

Issue 3: Should the resale discount apply to all telecommunication services BellSouth offers to end users, regardless of the tariff in which the service is contained?

WCOM: Yes. Offering a retail service under a tariff other than the private line or GSST tariffs does not preclude it from the wholesale discount.

Issue 4: This issue has been resolved.

Issue 5: Should BellSouth be required to provide OS/DA as a UNE?

WCOM: Yes. BellSouth must provide OS/DA as a UNE until it complies with the FCC's UNE Remand Order by offering effective selective routing. WorldCom would be willing to agree that BellSouth is not required to provide OS/DA as a UNE so long as it is able to route OS/DA traffic successfully to WorldCom's OS/DA platform using a compatible signaling protocol and without requiring WorldCom to install additional trunking. Preliminary testing of an OS/DA method proposed by BellSouth shows promise in this regard, but unless and until a number of issues are addressed satisfactorily, BellSouth should be required to provide OS/DA as a UNE.

Issue 6: Should BellSouth be directed to perform, upon request, the functions necessary to combine unbundled network elements that are ordinarily combined in its network?

WCOM: Yes. BellSouth should be directed to perform, upon request, the functions necessary to combine unbundled network elements that are ordinarily combined in BellSouth's network.

Issue 7: This issue has been resolved.

Issue 7A: Should BellSouth charge MCIW only for UNEs that it orders and uses, and should UNEs ordered and used by MCIW be considered part of its network for reciprocal compensation and switched access charges?

WCOM: WorldCom should be billed at UNE rates for UNEs that it orders and uses and for any other portions of BellSouth's network that are used to carry traffic that is originated over the UNEs ordered by WorldCom. These UNEs should be considered part of WorldCom's network for purposes of determining entitlement to reciprocal compensation and access charges.

Issue 8: Should UNE specifications include non-industry standard, BellSouth proprietary specifications?

WCOM: No. Only industry standard specifications should be used.

Issue 9: Should MCIW be required to use a special construction process, with additional costs, to order facilities of the type normally used at a location, but not available at the time of the order?

WCOM: No. The special construction process should only be required when the requested facilities are not of the type normally used at a location.

Issue 10: This issue has been resolved.

Issue 11: Should MCIW access the feeder distribution interface directly or should BellSouth be permitted to introduce an intermediate demarcation device?

WCOM: WorldCom should access subloop elements wherever it is technically feasible to do so, including at the feeder distribution interface, without having to connect to unneeded intermediate devices.

Issues 12-14: These issues have been resolved.

Issue 15: When an MCIW customer served via the UNE-platform makes a directory assistance or operator call, must the ANI-II digits be transmitted to MCIW via Feature Group D signaling from the point of origination?

WCOM: Yes. This information is needed to alert WorldCom to the number of the calling party and any calling restrictions on the line. As stated in Issue 5, BellSouth has proposed a method of routing OS/DA traffic which should enable it to transmit the ANI-II digits as requested by WorldCom.

Issues 16-17: These issues have been resolved.

Issue 18: Is BellSouth required to provide all technically feasible unbundled dedicated transport between locations and equipment designated by MCIW so long as the facilities are used to provide telecommunications services, including interoffice transmission facilities to network nodes connected to MCIW switches and to the switches or wire centers of other requesting carriers?

WCOM: Yes. BellSouth is required to provide dedicated interoffice transmission facilities to the locations and equipment designated by WorldCom, including network nodes connected to WorldCom switches and to the wire centers and switches of other requesting carriers.

Issue 19: How should BellSouth be required to route OS/DA traffic to MCIW's operator services and directory assistance platforms?

WCOM: WorldCom should have the option of having OS/DA traffic delivered to its OS/DA platforms in one of two ways. First, BellSouth should be required to transport this traffic using shared transport, either for all OS/DA calls or on an overflow basis, using a compatible signaling protocol from the point of origination. Second, BellSouth should be required, at WorldCom's option, to provide dedicated transport for this traffic, using a compatible signaling protocol from the point of origination. BellSouth has proposed, and the parties are testing, a routing method that may address the signaling protocol issue.

Issues 20-21: These issues have been resolved.

Issue 22: Should the Interconnection Agreements contain MCIW's proposed terms addressing line sharing, including line sharing in the UNE-P and unbundled loop configurations?

WCOM: Yes. The Interconnection Agreements should contain WorldCom's proposed terms addressing line sharing that are contained in a recent proposal made by WorldCom based on BellSouth's agreement with COVAD.

Issue 23: Does MCIW's right to dedicated transport as an unbundled network element include SONET rings that exist on BellSouth's network?

WCOM: Yes. WorldCom's right to dedicated transport as an unbundled network element includes SONET rings that exist on BellSouth's network.

Issues 24-27: These issues have been resolved.

Issue 28: Should BellSouth provide the calling name database via electronic download, magnetic tape, or via similar convenient media?

WCOM: Yes. BellSouth should provide the calling name database via electronic download or on magnetic tape.

Issue 29: Should calls from MCIW customers to BellSouth customers served via Uniserve, Zipconnect, or any other similar service, be terminated by BellSouth from the point of interconnection in the same manner as other local traffic, without a requirement for special trunking?

WCOM: Yes. Calls from WorldCom customers to BellSouth customers served via Uniserve, Zipconnect, or any other similar service, should be terminated by BellSouth from the point of interconnection in the same manner as is other local traffic, without a requirement for special trunking.

Issues 30-31: These issues have been resolved.

Issue 32: Should there be any charges for use of a joint optical interconnection facility built 50% by each party

WCOM: No. There should be no charge by either party for use of a joint optical interconnection facility that has been built 50% by each party.

Issue 33: Does MCIW have the right to require interconnection via a Fiber Meet Point arrangement, jointly engineered and operated as a SONET Transmission System (SONET ring) whether or not the SONET ring presently exists in BellSouth's network?

WCOM: Yes. WorldCom has the right pursuant to the Act, FCC regulations, and the Local Competition Order to require any technically feasible method of interconnection, including a Fiber Meet Point arrangement, jointly engineered and operated as a SONET Transmission System.

Issue 34: Is BellSouth obligated to provide and use two-way trunks that carry each party's traffic?

WCOM: Yes. BellSouth must provide and use two-way trunks pursuant to FCC regulations. Two-way trunks are more cost efficient and make testing easier.

Issue 35: This issue has been consolidated with Issue 34.

Issue 36: Does MCIW, as the requesting carrier, have the right pursuant to the Act, the FCC's Local Competition Order, and FCC regulations, to designate the network point (or points) of interconnection at any technically feasible point?

WCOM: Yes. WorldCom has the right pursuant to the Act, the FCC's Local Competition Order, and FCC regulations to designate the network point (or points) of interconnection at any technically feasible point. This includes WorldCom's right to designate a single point of interconnection (such as at BellSouth's access tandem) for termination of traffic throughout the LATA.

Issue 37: Should BellSouth be permitted to require MCIW to fragment its traffic by traffic type so it can interconnect with BellSouth's network?

WCOM: No. WorldCom should have the right to require the use of two-way trunks and to combine local, intraLATA and transit traffic on one trunk group.

Issue 38: This issue has been resolved.

Issue 39: How should Wireless Type 1 and Type 2A traffic be treated under the Interconnection Agreements?

WCOM: BellSouth should be required to turn over to the terminating carrier the reciprocal compensation payment that it receives from WorldCom for terminating this traffic. BellSouth is entitled to receive and retain a transiting fee; it is not entitled to retain the payment for reciprocal compensation.

Issue 40: What is the appropriate definition of internet protocol (IP) and how should outbound voice calls over IP telephony be treated for purposes of reciprocal compensation?

WCOM: The question of whether long-distance carriers should pay access charges when they utilize IP telephony is beyond the scope of this arbitration proceeding. The FCC has not imposed interstate access charges on IP telephony; the only available form of inter-carrier compensation for the services at issue in this arbitration is reciprocal compensation.

Issue 41: This issue has been resolved.

Issue 42: Should MCIW be permitted to route access traffic directly to BellSouth end offices or must it route such traffic to BellSouth's access tandem?

WCOM: WorldCom should be permitted to route terminating switched access traffic directly to BellSouth end offices. Under BellSouth's proposed requirement for WorldCom to route all traffic to the BellSouth access tandem, WorldCom would be precluded from offering competitive tandem switching and transport services to other carriers.

Issues 43-44: These issues have been resolved.

Issue 45: How should third party local transit traffic be routed and billed by the parties?

WCOM: From a routing perspective, this traffic should be exchanged over the same logical trunk group as all other local and intraLATA toll traffic. BellSouth should bill the originating carrier consistent with the Ordering and Billing Forum (OBF) Meet Point Billing Guidelines (single bill/single tariff option).

Issue 46: Under what conditions, if any, should the parties be permitted to assign an NPA/NXX code to end users outside the rate center in which the NPA/NXX is homed?

WCOM: The parties should be permitted to assign NPA/NXX codes to end users anywhere within the LATA. BellSouth does this today with respect to services such as foreign exchange (FX) services and its primary rate ISDN extended reach service (ERS). BellSouth should not be permitted to impose restrictions on WorldCom's ability to assign NPA/NXX codes to WorldCom's end-users.

Issue 47: Should reciprocal compensation payments be made for calls bound to ISPs?

WCOM: Yes. Reciprocal compensation payments should be applicable to calls made from one carrier's customers to the ISP customer of the other carrier. The terminating carrier incurs the cost of termination for ISP-bound calls in the same way as for any other local call.

Issue 48: This issue has been consolidated with Issue 45.

Issue 49: This issue has been resolved.

Issue 50: This issue has been consolidated with Issue 51.

Issue 51: Under what circumstances is BellSouth required to pay tandem charges when MCIW terminates BellSouth local traffic?

WCOM: BellSouth is required to pay tandem charges whenever WorldCom's network provides functionality equivalent to that of a tandem switch. In particular, such compensation is required when a WorldCom local switch covers a geographic area comparable to the area served by a BellSouth tandem.

Issue 52: This issue has been resolved.

Issue 53: Should call jurisdiction be based on the calling party number or on jurisdictional factors that represent averages?

WCOM: Calling party number should be used to the extent possible to determine the jurisdiction of billed traffic.

Issue 53A: Should MCIW be required to utilize direct end office trunking in situations involving tandem exhaust or excessive traffic volumes?

WCOM: No. WorldCom should not be required to utilize direct end office trunking in situations involving tandem exhaust or excessive traffic volumes. BellSouth should manage its network efficiently to avoid this situation from occurring.

Issue 54: Should security charges be assessed for collocation in offices with existing card key systems, and how should security costs be allocated in central offices where new card key systems are being installed?

WCOM: Security costs for collocation in central offices should be assessed to all parties, including BellSouth, on a per square foot basis.

Issue 55: This issue has been resolved.

Issue 56: Should BellSouth be required to provide DC power to adjacent collocation space?

WCOM: Yes. BellSouth should be required to provide DC power to adjacent collocation space.

Issues 57-58: These issues have been resolved.

Issue 59: Should collocation space be considered complete before BellSouth has provided MCIW with cable facility assignments ("CFAs")?

WCOM: No. Collocation space is unusable until CFAs have been provided and therefore should not be considered complete until they are provided.

Issue 60: Should BellSouth provide MCIW with specified collocation information at the joint planning meeting?

WCOM: Yes. The requested information (including information on power connectivity, cable type and termination requirements, and identification of technically feasible demarcation points) should be provided at the joint planning meeting.

Issue 61: Should the per ampere rate for provision of DC power to MCIW's collocation space apply to amps used or to fused capacity?

WCOM: The rate proposed by WorldCom in Attachment 1 should apply on a per used ampere basis, taking into account the rated capacity of the equipment actually installed in the collocation space.

Issue 62: This issue has been resolved.

Issue 63: Is MCIW entitled to use any technically feasible entrance cable, including copper facilities

WCOM: Yes. WorldCom is entitled to use any technically feasible entrance cable, including copper facilities.

Issue 64: Is MCIW entitled to verify BellSouth's assertion, when made, that dual entrance facilities are not available? Should BellSouth maintain a waiting list for entrance space and notify MCIW when space becomes available?

WCOM: Yes. WorldCom should be permitted to verify BellSouth's assertion that dual entrance facilities are not available. BellSouth should maintain a waiting list for entrance space and notify WorldCom when space becomes available.

Issue 65: What information must BellSouth provide to MCIW regarding vendor certification?

WCOM: BellSouth must provide WorldCom sufficient information on the specifications and training requirements for a vendor to become BellSouth certified so that WorldCom can train its proposed vendors. The brochures that BellSouth has provided to WorldCom are not sufficient for this purpose.

Issue 66: What industry guidelines or practices should govern collocation?

WCOM: The agreements should include the guidelines proposed by WorldCom in Attachment 5, with updated references to GR-63 and GR-1275.

Issue 67: When MCIW has a license to use BellSouth rights-of-way, and BellSouth wishes to convey the property to a third party, should BellSouth be required to convey the property subject to MCIW's license?

WCOM: Yes. WorldCom should not be required to forfeit its license rights, and possibly strand facilities, when BellSouth conveys the underlying property.

Issue 68: Should BellSouth require that payments for make-ready work be made in advance?

WCOM: No. A requirement for advance payment would create delays and would not be commercially reasonable. It would be commercially reasonable for WorldCom to pay invoices for such work within 14 days of receipt.

Issues 69-74: These issues have been resolved.

Issue 75: For end users served by INP, should the end user or the end user's local carrier be responsible for paying the terminating carrier for collect calls, third party billed calls or other operator assisted calls?

WCOM: The end user should be responsible for payment. The terminating carrier can obtain billing information from the end user's local carrier.

Issue 76-79: These issues have been resolved.

Issue 80: Should BellSouth be required to provide an application-to-application access service order inquiry process?

WCOM: Yes. Such a process is needed to obtain pre-order information electronically for UNEs ordered via an access service request. BellSouth should be required to allow WorldCom to order DS1 loop-transport combinations using an electronic ASR.

Issue 81: Should BellSouth provide a service inquiry process for local services as a pre-ordering function?

WCOM: Yes. BellSouth should provide service inquiry as a pre-ordering function, not solely as an ordering function. WorldCom needs information on the availability of facilities at the pre-ordering stage in order to be able to effectively market its competitive local services.

Issue 82-89: These issues have been resolved.

Issue 90: Should BellSouth be required to provide completion notices for manual orders?

WCOM: Yes. WorldCom should receive completion notices for all orders, including manual orders, so that it can determine when to begin billing its customers.

Issue 91: What intervals should apply to FOCs? Should BellSouth be required to check facilities before returning an FOC?

WCOM: WorldCom's proposed intervals should apply to FOCs. BellSouth should be required to check facilities before returning an FOC so that it represents a firm commitment to provide service on the specified date.

Issue 92: Should the parties be required to follow the detailed guidelines proposed by MCIW with respect to LNP orders?

WCOM: Yes. WorldCom's proposed guidelines adhere to OBF-approved process flows and cut-over guidelines. It is more appropriate to rely directly on industry standards than on a document incorporating BellSouth's interpretation of those standards.

Issue 93: By when must the parties bill for previously unbilled amounts? By when must they submit bills to one another?

WCOM: The parties must bill for previously unbilled amounts within one year of the bill date. The bill date should be no more than ninety days old.

Issue 94: Should BellSouth be permitted to disconnect service to MCIW for nonpayment?

WCOM: No. The parties should not disconnect for nonpayment. The appropriate remedy should be determined in dispute resolution.

Issue 95: Should BellSouth be required to provide MCIW with billing records with all EMI standard fields?

WCOM: BellSouth should be required to provide MCIW with complete EMI billing records, not simply the subset of such information contained in ADUF, ODUF, and EODUF.

Issue 96: Should BellSouth be required to give written notice when a central office conversion will take place before midnight or after 4 a.m.?

WCOM: Yes. Because central office conversions can involve taking down an ALEC's switched services, WorldCom needs to receive specific written notice when such conversions will take place outside of the time window agreed to by the parties.

Issue 96A: Should BellSouth be required to provide customer service record (CSR) information in a format that permits its use in completing an order for service?

WCOM: Yes. BellSouth should either parse CSR information in accordance with industry standards or, if no industry standards exist, should address the parsing of CSR information through the established Change Control Process (CCP).

Issue 97: Should BellSouth be required to provide MCIW with notice of changes to NPA/NXXs linked to Public Safety Answering Points as soon as such changes occur?

WCOM: Yes. Obtaining this information in a timely manner is a matter of public safety.

Issue 98: This issue has been resolved.

Issue 99: Should BellSouth be required to provide MCIW with 10 digit PSAP numbers?

WCOM: Yes. BellSouth should be required to provide this information, which is currently required under the existing BellSouth/WCOM interconnection agreement.

Issue 100: Should BellSouth operators be required to ask MCIW customers for their carrier of choice when such customers request a rate quote or time and charges?

WCOM: Yes. BellSouth should be required to ask a caller for his or her carrier of choice if the caller requests a rate quote or time and charges.

Issue 101: Is BellSouth required to provide shared transport in connection with the provision of custom branding? Is MCIW required to purchase dedicated transport in connection with the provision of custom branding?

WCOM: BellSouth is required to provide shared transport as an unbundled network element and shared transport can be used in connection with the provision of custom branding. WorldCom is not required to purchase dedicated transport.

Issue 102: Should the parties provide "inward operator services" through local interconnection trunk groups using network routable access codes BellSouth establishes through the LERG?

WCOM: Yes. Local interconnection trunks often provide the most efficient way to provide this service.

Issue 103-104: These issues have been resolved.

Issue 105: What performance measurement system should BellSouth be required to provide?

WCOM: BellSouth should use the performance measurement system outlined in WorldCom's proposed Attachment 10, along with the attached WorldCom Measurements and Performance Standards, Version 1.3.

Issue 106: This issue has been resolved.

Issue 107: Should the parties be liable in damages, without a liability cap, to one another for their failure to honor in one or more material respects any one or more of the material provisions of the Agreements?

WCOM: Yes. There should be no limitation of liability for material breaches of the Agreements.

Issue 108: Should MCIW be able to obtain specific performance as a remedy for BellSouth's breach of contract?

WCOM: Services under the Agreements are unique, and specific performance is an appropriate remedy for BellSouth's failure to provide the services as required in the Agreements.

Issue 109: Should BellSouth be required to permit MCIW to substitute more favorable terms and conditions obtained by a third party through negotiation or otherwise, effective as of the date of MCIW's request. Should BellSouth be required to post on its website page all BellSouth's interconnection agreements with third parties within fifteen days of the filing of such agreements with the FPSC?

WCOM: BellSouth should permit WorldCom to substitute more favorable terms and conditions effective as of the date of WorldCom's request. Interconnection agreements should be posted on BellSouth's web site to facilitate access.

Issue 110: Should BellSouth be required to take all actions necessary to ensure that MCIW confidential information does not fall into the hands of BellSouth's retail operations and should BellSouth bear the burden of proving that such disclosure falls within enumerated exceptions?

WCOM: Yes. BellSouth should take all measures necessary to protect WorldCom's confidential information from BellSouth's retail operations, and should bear the burden of proving that disclosure falls within enumerated exceptions.

Issue 111: Should MCIW's proposed procedures be followed for usage audits for reporting and auditing of PIUs and PLUs?

WCOM: Yes. The procedures WorldCom has proposed for such audits should be followed.


G. Stipulations. No matters have been stipulated at this time beyond the issues that have been resolved.

H. Pending Matters. WorldCom has no pending motions or other matters that require action at this time.

I. Requirements of Order on Procedure. WorldCom has not identified any requirements of the Order on Procedure that cannot be complied with.

RESPECTFULLY SUBMITTED this 7th day of September, 2000.

HOPPING GREEN SAMS & SMITH, P.A.

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Attorneys for WorldCom

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by U.S. Mail or Hand Delivery (*) this 7th day of September, 2000:

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