



Florida Cable Telecommunications Association

Steve Wilkerson, President

VIA HAND DELIVERY

April 12, 2002

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

RE: Docket No. 990649B-TP

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of the Prehearing Statement of the Florida Cable Telecommunications Association, and a diskette containing the Prehearing Statement in Word Perfect format.

Copies of the Prehearing Statement have been served on the parties of record. Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing. Please contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael A. Gross', with a long, sweeping underline that extends to the right.

Michael A. Gross
Vice President, Regulatory Affairs &
Regulatory Counsel

Enclosure

cc: All Parties of Record

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FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of Florida Cable Telecommunications Association's Prehearing Statement, in Docket 990649B-TP have been served upon the following parties by U.S. Mail delivery this 27th day of April, 2002:

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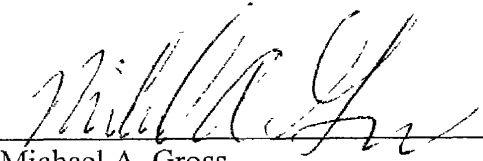
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Michael A. Gross

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of)
unbundled network elements.)
_____)

Docket No. 990649B-TP
Filed: April 12, 2002

PREHEARING STATEMENT OF THE FLORIDA
CABLE TELECOMMUNICATIONS ASSOCIATION

Florida Cable Telecommunications Association (FCTA), pursuant to Order No. PSC-02-0429-PCO-TP, issued on March 28, 2002; Order No. PSC-02-0130-PCO-TP, issued on January 29, 2002; Order No. PSC-02-0090-PCO-TP, issued on January 15, 2002; Order No. PSC-01-1676-PCO-TP, issued on August 16, 2001; and Order No. PSC-01-1592-PCO-TP, issued on August 2, 2001, of the Florida Public Service Commission, files its Prehearing Statement and states:

A. Witnesses

The FCTA has not filed any testimony and does not intend to present any witnesses in this proceeding.

B. Exhibits

The FCTA does not intend to use any exhibits in this proceeding.

C. Basic Position

The FCTA intervened in this docket to represent the interests of its members who are certificated ALECs offering service in Florida. Although the FCTA offered testimony and participated more actively in the initial BellSouth phase of this proceeding, cable affiliated ALECs have over time tended to be more facilities-based carriers and rely less on UNEs than many other ALECs. Nevertheless, the FCTA has continued to monitor this docket

closely in order to respond to potential issues which may impact its ALEC members. As of the filing date for prehearing statements, the FCTA does not intend to raise any new issues not raised by the other parties or the Commission. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

D.-F. Positions on the Issues

Issue 1: What factors should the Commission consider in establishing rates and charges for UNEs (including deaveraged UNEs and UNE combinations)?

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

Issue 2: (a) What is the appropriate methodology to deaverage UNEs and what is the appropriate rate structure for deaveraged UNEs?

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new

issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

(b) For which of the following UNEs should the Commission set deaveraged rates?

- (1) loops (all);
- (2) local switching;
- (3) interoffice transport (dedicated and shared);
- (4) other (including combinations).

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

Issue 3: (a) What are xDSL capable loops?

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

- (b) Should a cost study for xDSL-capable loops make distinctions based on loop length and/or the particular DSL technology to be deployed?

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

- Issue 4:** (a) Which subloop elements, if any, should be unbundled in this proceeding, and how should prices be set?

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

- (b) How should access to such subloop elements be provided, and how should prices be set?

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or

the Commission, and (2) to adopt any position properly stated by any other party.

Issue 5: For which signaling networks and call-related databases should rates be set?

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

Issue 6: Under what circumstances, if any, is it appropriate to recover non-recurring costs through recurring rates?

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

Issue 7: What are the appropriate assumptions and inputs for the following items to be used in the forward-looking recurring UNE cost studies?

- (a) network design (including customer location assumptions);
- (b) depreciation;
- (c) cost of capital;

- (d) tax rates;
- (e) structure sharing;
- (f) structure costs;
- (g) fill factors;
- (h) manholes;
- (i) fiber cable (material and placement costs);
- (j) copper cable (material and placement costs);
- (k) drops;
- (l) network interface devices;
- (m) digital loop carrier costs;
- (n) terminal costs;
- (o) switching costs and associated variables;
- (p) traffic data;
- (q) signaling system costs;
- (r) transport system costs and associated variables;
- (s) loadings;
- (t) expenses;
- (u) common costs;
- (v) other.

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new

issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

Issue 8: What are the appropriate assumptions and inputs for the following items to be used in the forward-looking non-recurring UNE cost studies?

- (a) network design;
- (b) OSS design;
- (c) labor rates;
- (d) required activities;
- (e) mix of manual versus electronic activities;
- (f) other.

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

Issue 9: (a) What are the appropriate recurring rates (averaged or deaveraged as the case may be) and non-recurring charges for each of the following UNEs?

- (1) 2-wire voice grade loop;
- (2) 4-wire analog loop;

- (3) 2-wire ISDN/IDSL loop;
- (4) 2-wire xDSL-capable loop;
- (5) 4-wire xDSL-capable loop;
- (6) 4-wire 56 kbps loop;
- (7) 4-wire 64 kbps loop;
- (8) DS-1 loop;
- (9) high capacity loops (DS3 and above);
- (10) dark fiber loop;
- (11) subloop elements (to the extent required by the Commission in Issue 4);
- (12) network interface devices;
- (13) circuit switching (where required);
- (14) packet switching (where required);
- (15) shared interoffice transmission;
- (16) dedicated interoffice transmission;
- (17) dark fiber interoffice facilities;
- (18) signaling networks and call-related databases;
- (19) OS/DA (where required).

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or

the Commission, and (2) to adopt any position properly stated by any other party.

- (b) Subject to the standards of the FCC's Third Report and Order, should the Commission require ILECs to unbundle any other elements or combinations of elements? If so, what are they and how should they be priced?

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

Issue 10: What is the appropriate rate, if any, for customized routing?

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

Issue 11: (a) What is the appropriate rate if any, for line conditioning, and in what situations should the rate apply?

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its

conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

- (b) What is the appropriate rate, if any, for loop qualification information, and in what situations should the rate apply?

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

Issue 12: Without deciding the situations in which such combinations are required, what are the appropriate recurring and non-recurring rates for the following UNE combinations:

- (a) “UNE platform” consisting of: loop (all), local (including packet, where required) switching (with signaling), and dedicated and shared transport (through and including local termination);

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or

the Commission, and (2) to adopt any position properly stated by any other party.

(b) “extended links,” consisting of:

- (1) loop, DSO/1 multiplexing, DS1 interoffice transport;
- (2) DS1 loop, DS1 interoffice transport;
- (3) DS1 loop, DS1/3 multiplexing, DS3 interoffice transport.

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

Issue 13: When should the recurring and non-recurring rates and charges take effect?

Position:

No position. Nevertheless, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief: (1) to respond to any new issues generated by the evidence at the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

G. Stipulated Issues

The FCTA has not stipulated to any issues with any party to the proceeding.

H. Pending Motions

The FCTA has no pending motions or other matters it seeks action upon.

I. Pending Requests for Claims for Confidentiality

The FCTA does not have any pending requests or claims for confidentiality .

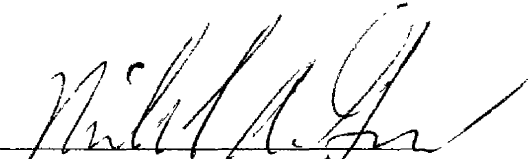
J. Requirements of Order Nos. PSC-02-0429-PCO-TP, PSC-02-0130-PCO-TP, PSC-02-0090-PCO-TP, PSC-01-1676-PCO-TP, and PSC-01-1592-PCO-TP

There are no requirements of Order Nos. PSC-02-0429-PCO-TP, PSC-02-0130-PCO-TP, PSC-02-0090-PCO-TP, PSC-01-1676-PCO-TP, and PSC-01-1592-PCO-TP with which FCTA cannot comply.

K. Decisions or Pending Decisions of the FCC or any Court

The FCTA does not have a position as to whether there are any decisions or pending decisions of the FCC or any court that either preempt or may preempt or, otherwise impact the Commission's ability to resolve any of the issues presented or the relief requested in this matter.

Respectfully submitted this 31st day of April, 2002.


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