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November 4, 2002

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By Hand Delivery

Blanca S. Bayo', Director
Division of the Commission Clerk &
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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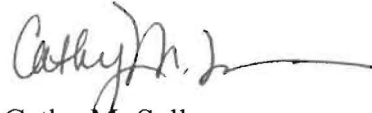
**Re: In re: Global NAPs, South, Inc. Petition for Arbitration Pursuant to
47 U.S.C. §252(b) of Interconnection Rates, Terms and Conditions
with ALLTEL Florida, Inc., Docket No. 011354**

Dear Ms. Bayo':

Enclosed for filing on behalf of Global NAPs, South, Inc. are the original and 15 copies of its Prehearing Statement in the above-styled matter, together with a diskette containing the electronic version of same. The Prehearing Statement is in Word format with the Certificate of Service in Word Perfect format.

If you have any questions, please give us a call.

Sincerely,



Cathy M. Sellers

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Global NAPs South, Inc.
Petition for Arbitration Pursuant
To 47 U.S.C. §252(b) of Interconnection
Rates, Terms and Conditions with
ALLTEL Florida, Inc.

Docket No. 011354-TP
Filed: November 4, 2002

PREHEARING STATEMENT OF GLOBAL NAPs SOUTH, INC.

Pursuant to Order No. PSC-02-1312-PCO-TP and Rule 28-106.209, Global NAPs South, Inc. Files Its Respective Prehearing Statement.

A. APPEARANCES:

Jon C. Moyle, Jr.
Florida Bar No. 727016
Cathy Sellers
Florida Bar No. 0784958
Moyle, Flanigan, Katz, Raymond and Sheehan, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301

James R. J. Scheltema
By Pro Hac Vice
Director - Regulatory Affairs
Global NAPs, Inc.
5042 Durham Road West
Columbia, MD 21044-1445

On behalf of Global NAPs South, Inc., Petitioner

B. WITNESSES:

Dr. Lee L. Selwyn
William J. Rooney

These are the witnesses identified at this time who may be called. To the extent that other witnesses become known or available as discovery continues, the right to call additional witnesses is reserved.

C. EXHIBITS:

Exhibit __ (LLS-1) Technical Qualifications and Professional Experience

Exhibit __ (LLS-2) "The Triumph of Light", Scientific American, (January, 2001)

Exhibit ___(LLS-3) Workpapers Supporting Transport Distance and Cost Calculations

Exhibit ___(LLS-4) Efficient InterCarrier Compensation Mechanisms for the Emerging Competitive Environment (August, 2001)

D. STATEMENT OF BASIC POSITION:

Alltel proposes burdensome terms and conditions which are designed to (1) retain its monopoly revenue streams (2) preclude economically viable competition and (3) deny consumers deserved benefits. It does so under the guise of claiming “rural exemption”, but continuation of such classification only insures Alltel of its insular status in spite of the congressional mandate to “promote” competition.

In contrast to other jurisdictions, such as New York, where the Commission found that Global’s competitive FX offering via non-geographically correlated NXXs can provide real alternatives and competitive benefits, especially to those in rural areas, Alltel proposes that its Florida consumers remain its loyal, and exclusive, subjects. Alltel’s fiefdom should not be allowed to continue, but instead, should be opened to competition just as other Florida ILEC’s service territories have been opened. Alltel’s claim that it is a small carrier is belied by its capitalization. Alltel should be properly viewed as a part of a national telecommunications conglomerate, rather than an isolated independent.

E. STATEMENT OF ISSUES AND POSITIONS:

ISSUE 1: PHYSICAL INTERCONNECTION ARCHITECTURE AND ASSOCIATED COST RESPONSIBILITY

Sub Issue 1(A) Should Global NAPs be required to interconnect at more than one point in a LATA with Alltel?

Sub Issue 1(B) Should each Party be financially responsible for all of the costs associated with its originating traffic that terminates on the other Parties’ network, regardless of the location and/or number of points of interconnection, as long as there is at least one Point of Interconnection per LATA?

Global: Global NAPs should not be required to provide more than one point of interconnection per LATA. Each carrier should be financially responsible for carriage of traffic on its respective side of this/these point(s) of interconnection.

ISSUE 2: LATA-WIDE LOCAL CALLING AND MUTUAL COMPENSATION

Should Alltel’s local calling area boundaries be superimposed on GNAPs to constrain GNAPs from expanding local calling areas within that

LATA?

Global: Global NAPs should not have its retail local calling areas limited by Alltel's retail or wholesale local calling areas. Instead, the size of local calling areas should be subject to competition. In order to effect such competition and eliminate economic constraints related to the ILEC's local calling area definitions, all intra-LATA traffic exchanged between GNAPs and Alltel should be treated as cost-based "local" compensation under §251(b)(5), and should not be subject to intrastate access charges.

ISSUE 3: DEPLOYMENT OF NON-GEOGRAPHICALLY CORRELATED NXX CODES.

Must NXX codes assigned to Global be geographically linked or can Global provide customers competitive FX service using its assigned NXX codes?

Global: Global NAPs should be allowed to use an assignment of NXX codes to provide competitive FX service because there is no longer a nexus necessary between assignment of NXX codes and geography.

ISSUE 4: RECIPROCAL COMPENSATION

Should Alltel make its election of reciprocal compensation rate design and should this be incorporated in the interconnection agreement? Should Alltel provide full reservation of rights concerning ISP-bound reciprocal compensation provision to allow for contract modification to comport with decisions expected from currently pending litigation at the FCC?

Global: Alltel should make its election and incorporate the current federal rules regarding intercarrier compensation within the Global NAPs/Alltel Interconnection Agreement. Alltel should provide for a reservation of rights by the parties pending the anticipated decision from the remanded ISP decision by the FCC.

F. STATEMENT OF WITNESS RESPONSIBILITIES:

Dr. Lee L. Selwyn will be responsible for all issues with the exception of the reservations of rights and requested change of law provision relating to the remanded ISP decision by the FCC.

G. QUESTIONS OF FACT AND LAW:

Although the Order requests separate statements regarding factual vs. legal

questions, as noted from the above delineation of the issues, these are often intertwined.

I. STIPULATED ISSUES:

None at this time.

J. PENDING MOTIONS:

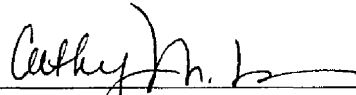
Global NAPs South, Inc. has none, including any motion requesting confidentiality.

K. NOTICE OF FEDERAL PREEMPTION:

Global NAPs South respectfully submits that all intercarrier compensation issues regarding information access traffic have been declared to be subject to the sole and exclusive jurisdiction of the Federal Communications Commission. Global shall provide legal argument(s) in its brief regarding the extent that other federal and state law impact the ability of the Florida PSC to make a decision, or in any way be determined to be relevant legal authority to the issues before the Commission.

L. OTHER MATTERS:

None at this time.



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Attorneys for Global NAPs South, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by hand delivery to those with an asterisk * and by U.S. Mail to all others on the following list this 4th day of November, 2002:

Wayne Knight *
Adam Teitzman
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

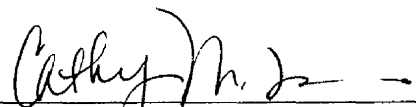
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Cathy M. Sellers