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REPLY TO:
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July 8, 1993

Mr. Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

via Hand Delivery

Re: Petition for Expanded Interconnection for Alternate
Access Vendors within Local Exchange Company
Central Offices by Intermedia Communications of
Florida, Inc.; Docket No. 921074-TP

Dear Mr. Tribble:

Enclosed for filing please find an original and fifteen copies
of Florida Cable Television Association, Inc. Prehearing Statement
for the above-referenced docket. You will also find a copy of this
letter enclosed and a diskette containing this same information.
Please date-stamp the copy of the letter to indicate that the
original was filed and return a copy to me.

ACK ✓
AFA T
APP _____
CAF _____
CMI (circled) _____
CT3 _____

If you have any questions regarding this matter, please feel
free to contact me. Thank you for your assistance in processing
this filing.

Respectfully,

PENNINGTON, HABEN, WILKINSON,
CULPEPPER, DUNLAP, DUNBAR,
RICHMOND & FRENCH, P.A.

Peter M. Dunbar
Peter M. Dunbar

WAS _____
OTH _____
PMD/tmz
Enclosures

cc: All parties of record

DOCUMENT NUMBER-DATE

07323 JUL-83

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expanded)
Interconnection for Alternate)
Access Vendors within Local)
Exchange Company Central)
Offices by Intermedia)
Communications of Florida, Inc.)
_____)

Docket No.: 921074-TP
Filed: July 8, 1993

PREHEARING STATEMENT
BY FLORIDA CABLE TELEVISION ASSOCIATION, INC.

COMES NOW, Florida Cable Television Association, Inc. ("FCTA"), pursuant to Rule 25-22.038, Florida Administrative Code, and the Order Establishing Procedure (Order No. PSC-93-0811-PCO-TP), and respectfully submits its Prehearing Statement in the above-captioned docket to the Florida Public Service Commission ("Commission").

I. SUMMARY STATEMENT OF BASIC POSITION

Under the current provisions of Chapter 364, Florida Statutes, the Commission has the authority to authorize expanded interconnection for alternative access vendors within local exchange company central offices. Expanded interconnection is in the public interest and should be authorized for certificated telecommunications services providers.

II. WITNESSES, TESTIMONY AND EXHIBITS

FCTA does not intend to call any witnesses, present testimony or present exhibits in this docket.

III. ISSUES OF LAW AND POLICY

FCTA recognizes and acknowledges that twenty-one (21) issues of law and policy have been identified and will be addressed by the

DOCUMENT NUMBER-DATE

07323 JUL-88

FPSC-RECORDS/REPORTING

Commission in this docket. Each is incorporated in this Prehearing Statement by reference, and is believed by FCTA to be at issue.

ISSUE 1:

Is expanded interconnection for special access and/or private line in the Public Interest?

FCTA's POSITION:

Yes.

ISSUE 2:

How does the FCC's order on expanded interconnection impact the Commission's ability to impose forms and conditions of expanded interconnection that are different from those imposed by the FCC's order.

FCTA's POSITION:

No position at this time.

ISSUE 3:

Under what circumstances should the Commission impose different forms and conditions of expanded interconnection?

FCTA's POSITION:

No position at this time.

ISSUE 4:

Does Chapter 364 Florida Statutes allow the Commission to require expanded interconnection?

FCTA's POSITION:

Yes.

ISSUE 5:

Does a physical collocation mandate raise federal and/or state constitutional questions about the taking or confiscation of LEC property?

FCTA's POSITION:

No.

ISSUE 6:

Should the Commission require physical and/or virtual collocation?

FCTA's POSITION:

Yes.

ISSUE 7:

What LECs, if any, should be required to provide expanded interconnection?

FCTA's POSITION:

No position at this time.

ISSUE 8:

Where should expanded interconnection be offered?

FCTA's POSITION:

No position at this time.

ISSUE 9:

Who should be allowed to interconnect?

FCTA's POSITION:

No position at this time.

ISSUE 10:

Should the same terms and conditions of expanded interconnection apply to AT&T as apply to other interconnectors?

FCTA's POSITION:

No position at this time.

ISSUE 11:

Should the Commission require standards for physical and/or virtual collocation? If so, what should they be?

FCTA's POSITION:

No position at this time.

ISSUE 12:

Should collocators be required to allow LECs and other parties to interconnect with their network?

FCTA's POSITION:

No position at this time.

ISSUE 13:

What standards should be established for the LECs to allocate space for collocators?

FCTA's POSITION:

No position at this time.

ISSUE 14:

Should the Commission allow expanded interconnection for non-fiber optic technology?

FCTA's POSITION:

Yes.

ISSUE 15:

If the Commission permits expanded interconnection, what pricing flexibility should the LECs be granted for special access and private line services?

FCTA's POSITION:

No position at this time.

ISSUE 16:

If the Commission permits collocation, what rates, terms, and conditions should be tariffed by the LEC?

FCTA's POSITION:

No position at this time.

ISSUE 17:

Should all special access and private line providers be required to file tariffs?

FCTA's POSITION:

No position at this time.

ISSUE 18:

What separations impact will expanded interconnection have on the LECs?

FCTA's POSITION:

No position at this time.

ISSUE 19:

How would ratepayers be financially affected by expanded interconnection?

FCTA's POSITION:

No position at this time.

ISSUE 20:

Should the Commission grant ICI's petition?

FCTA's POSITION:

Yes.

ISSUE 21:

Should expanded interconnection be subject to a "net revenue test" requirement in order to avoid possible cross-subsidy concerns?

FCTA's POSITION:

No position at this time.

IV. PENDING MATTERS

FCTA is not aware of any pending matters at this time.

RESPECTFULLY SUBMITTED this 8th day of July, 1993.

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**CERTIFICATE OF SERVICE
DOCKET NO. 921074-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by U.S. Mail on this 8th day of July, 1993, to the following parties of record:

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