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July 8, 1993

BY HAND DELIVERY

Mr. Steven C. Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Petition of Intermedia Communications of
Florida, Inc. for Expanded Interconnection
for AAVs within LEC Central Offices
Docket No. 921074-TP

Dear Mr. Tribble:


Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of ALLTEL Florida, Inc.'s Prehearing Statement.

We are also submitting the Prehearing Statement on the enclosed 5" high density diskette generated on a DOS computer in Word Perfect 5.1 format.

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Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

J. Jeffrey Wahlen

JJW/csu
Enclosures

cc: All Parties of Record (w/encl.)

FPS BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
07348 JUL-83

RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Intermedia)
Communications of Florida, Inc. for) DOCKET NO. 921074-TP
Expanded Interconnection for AAVs) Filed: July 8, 1993
within LEC Central Offices)
_____)

ALLTEL FLORIDA, INC.'S PREHEARING STATEMENT

ALLTEL Florida, Inc. ("ALLTEL"), by and through its under-
signed counsel and pursuant to Order No. PSC-93-0811-PCO-TP,
submits the following Prehearing Statement:

(a) The name of all known witnesses that may be called by the party, and the subject matter of their testimony.

None.

(b) A description of all known exhibits that may be used by the party, whether they may be identified on a composite basis, and the witness sponsoring each.

None.

(c) A statement of basic position in the proceeding.

ALLTEL has no position on the issues in this case as they relate to Tier 1 local exchange companies. As this proceeding may relate to Tier 2 companies like ALLTEL, the FPSC's policy on expanded interconnection for alternative access vendors ("AAVs") should mirror the policy recently adopted by the Federal Communication Commission, i.e., expanded interconnection should not be required for Tier 2 local exchange companies like ALLTEL.

(d), (e), (f) A statement of each question of fact, law and policy the party considers at issue; the party's position on each such issue; and which of the party's witnesses will address the issue.

1. **Is expanded interconnection for special access and/or private line in the public interest?**

No position at this time.

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?**

No position at this time.

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

See position on Issue No. 7.

4. **Does Chapter 364, Florida Statutes, allow the Commission to require expanded interconnection?**

No position at this time.

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

No position at this time.

6. **Should the Commission require physical and/or virtual collocation?**

ALLTEL has no position on this issue as it relates to Tier 1 local exchange companies. The FPSC should not require physical and/or virtual collocation for Tier 2 local exchange companies like ALLTEL. See ALLTEL's position on Issue 7.

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

ALLTEL has no position on this issue as it relates to Tier 1 companies. As it relates to Tier 2 companies like ALLTEL, the FPSC's policy on expanded interconnection for alternative access vendors should mirror the policy recently adopted by the FCC, i.e., expanded interconnection should not be required for Tier 2 local exchange companies like ALLTEL. The FCC Order applies only to Tier 1 local exchange companies and specifically, for good reason, exempts all others. The FCC, after receiving and considering comments from all elements of the telecommunications industry, concluded:

"56. ... it is unlikely that there would be great demand for expanded interconnection in

the smaller LECs' service areas, at least in the near term. Requiring smaller LECs to offer expanded interconnection might also tax their resources and harm universal service and infrastructure development in rural areas. We believe that the demand for expanded interconnection that does exist in rural areas typically would come from a single large user. The use of expanded interconnection offerings by such customer could create substantial stranded LEC investment that could not readily be reused, possibly threatening the economic viability of a small LEC.

"57. We therefore adopt our proposal to limit the requirement to Tier 1 LECs ... We also conclude that NECA pool members should be excluded from expanded interconnection requirements, at least for the present ..."

Order at 29.

In support of its view that requiring smaller LECs to offer expanded interconnection might threaten their economic viability, the FCC stated:

"While large customers currently can bypass the LEC entirely using non-LEC facilities from their premises to the end point of the circuit, expanded interconnection makes the use of non-LEC alternatives more attractive to a greater range of customers by allowing substitution of alternative facilities for selected portions of the LEC network."

The FCC's reasoning on this subject is equally applicable to Florida and its Non-Tier 1 companies. In the absence of any significant or compelling evidence contrary to the FCC's position and its underlying rationale, the Commission should follow the lead of the FCC on this point and exempt Florida's Non-Tier 1 LECs from any requirement of expanded interconnection.

8. Where should expanded interconnection be offered?

No position at this time.

9. Who should be allowed to interconnect?

No position at this time.

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

No position at this time.

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

No position at this time.

12. Should collocators be required to allow LECs and other parties to interconnect with their networks?

No position at this time.

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

No position at this time.

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

No position at this time.

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

No position at this time.

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

No position at this time.

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

No position at this time.

18. What separations impact will expanded interconnection have on the LECs?

No position at this time.

19. How would ratepayers be financially affected by expanded interconnection?

No position at this time.

20. Should the Commission grant ICI's petition?

Please see ALLTEL's basic position.

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

No position at this time.

(g) A statement of issues that have been stipulated to by the parties.

None.

(h) A statement of all pending motions or other matters the party seeks action upon.

None.

(i) A statement as to any requirement set forth in this order that cannot be complied with, and the reasons therefore.

None.

DATED this 8th day of July, 1993.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 8th day of July, 1993, to the following:

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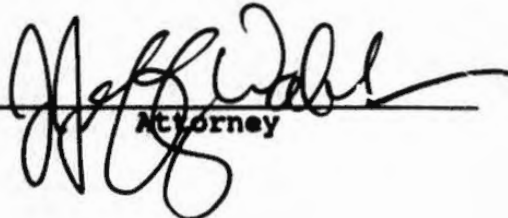
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