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**Mr. Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
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**Subject: Docket No. 921074-TP
Petition of INTERMEDIA COMMUNICATIONS OF FLORIDA,
INC., for Expanded Interconnection for AAVs Within
LEC Central Offices**

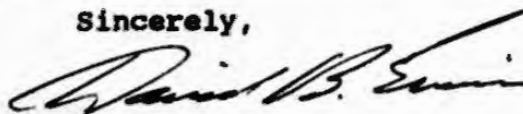
Dear Mr. Tribble:

Enclosed are the original and 15 copies of the Prehearing Statement of Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company. Also enclosed are the original and 15 copies of the Rebuttal Testimony of John Carroll on behalf of Northeast Florida Telephone Company, Indiantown Telephone System, Inc., Quincy Telephone Company and Southland Telephone Company.

Copies have been provided as shown on the Certificate of Service.

Please contact me if you have any questions.

Sincerely,



David B. Erwin

DBE:akh

Enclosures

Testimony
DOCUMENT NUMBER-DATE

07353 JUL-88

7750-RECORDS/REPORTING

Prehearing
DOCUMENT NUMBER-DATE

07352 JUL-88

7750-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition of INTERMEDIA) Docket No. 921074-TP
COMMUNICATIONS OF FLORIDA,)
INC., for Expanded Inter-)
connection for AAVs Within) Filed: July 8, 1993
LEC Central Offices)

PREHEARING STATEMENT
OF
INDIANTOWN TELEPHONE SYSTEM, INC.
NORTHEAST FLORIDA TELEPHONE COMPANY
QUINCY TELEPHONE COMPANY
SOUTHLAND TELEPHONE COMPANY

Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company, through their undersigned attorneys, file this Prehearing Statement, pursuant to the provisions of Rule 25-22.038, F.A.C., and Order No. PSC-93-0811-PCO-TP, as follows:

a) Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company have nominated one witness, John Carroll, of Northeast Florida Telephone Company, to present rebuttal testimony on their behalf, in the interest of conserving time and avoiding repetitious testimony. Mr. Carroll will sponsor only rebuttal testimony. The parties have not filed any direct testimony.

Mr. Carroll's testimony will take issue with positions in direct testimony that fail to take into consideration the small size of Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company, and Southland

Telephone Company, the rural nature of their territories, the potential adverse impact upon their businesses and the need for flexibility and options inherent in their operations.

b) Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company do not intend to file any exhibits.

c) The basic position of Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company is that it would be contrary to the public interest to impose a requirement on them to permit physical collocation under the same circumstances which would impose the requirement on those LECs with vastly greater annual revenues, urban service areas and immediate competitive pressures. Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company take the position that if the occasion arises where expanded interconnection for special access is required, the needs should be addressed on a case-by-case basis and negotiated, not tariffed. In addition, Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company must have recognition by the Commission that expanded interconnection will have possible financial and rate structure impacts on them and their rural subscribers.

d) through g) - See Appendix A attached hereto.

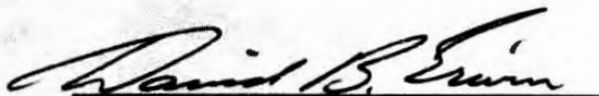
h) Indiantown Telephone System, Inc., Northeast Florida

Telephone Company, Quincy Telephone Company and Southland Telephone Company have not stipulated to any issues.

i) Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company have no pending motions upon which action is sought.

j) Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company know of no requirement of the Prehearing Procedure Order that cannot be complied with.

Respectfully submitted,



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APPENDIX "A"

1. Is extended interconnection for special access and/or private line in the Public Interest?

RESPONSE: Indiantown Telephone System, Inc. ("Indiantown"), Northeast Florida Telephone Company ("Northeast"), Quincy Telephone Company ("Quincy") and Southland Telephone Company ("Southland") respond only as to their own situations and believe that expanded interconnection for special access would not be in the public interest unless those matters peculiar to each of these small companies, as providers of service to rural subscribers, is taken into consideration and universal service is preserved.

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?

RESPONSE: Since the FCC's order does not apply to Indiantown, Northeast, Quincy and Southland, the Commission may impose forms and conditions of expanded interconnection on Indiantown, Northeast, Quincy and Southland that are different than those imposed by the FCC's order. However, since the FCC has excluded small companies, consistency would require that the Commission do the same. Otherwise, the small companies could face a host of questions about policing obligations and have placed upon them as rural companies other administrative burdens.

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

RESPONSE: The Commission should consider forms and conditions of expanded interconnection that are pertinent to Indiantown, Northeast, Quincy and Southland, each of which is a small LEC serving a rural base of subscribers.

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

RESPONSE: Yes.

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

RESPONSE: Yes. We believe there is pending litigation.

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

RESPONSE: The Commission should not require mandatory physical collocation, and no interconnection requirements should be imposed upon Indiantown, Northeast, Quincy or Southland without giving consideration to the specific and peculiar circumstances pertaining to each of the individual companies.

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

RESPONSE: Indiantown, Northeast, Quincy and Southland should not be required to provide expanded interconnection, but should be given the option to permit interconnection upon appropriate negotiated terms and conditions where circumstances suggest that there is a need to do so.

8. Where should expanded interconnection be offered?

RESPONSE: Expanded interconnection should be offered in those situations where the net revenue retained by Indiantown, Northeast, Quincy or Southland would exceed the costs of provision of the service and the companies are permitted to negotiate favorable terms and conditions.

9. Who should be allowed to interconnect?

RESPONSE: No position.

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

RESPONSE: No position.

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

RESPONSE: No.

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

RESPONSE: Yes, if collocation is required for the small companies, then reciprocity is desirable.

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

RESPONSE: None.

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

RESPONSE: No.

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

RESPONSE: If competition materializes in the rural areas of Indiantown, Northeast, Quincy and Southland, the companies need sufficient pricing flexibility to respond to competitive situations in a timely manner.

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

RESPONSE: None. If a tariff is required, the companies should be allowed to recover in tariff prices all costs, including capital costs.

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

RESPONSE: Yes, if LECs have to. Regulatory burdens should be equivalent.

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

RESPONSE: There will be an effect, but Indiantown, Northeast, Quincy and Southland are unable at the present time to quantify that effect.

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

RESPONSE: Different classes of ratepayers may be affected differently and the rural subscribers may be adversely affected by expanded interconnection.

20. Should the Commission grant ICI's petition?

RESPONSE: No position.

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

RESPONSE: See No. 8 above.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the Prehearing Statement of Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company in Docket No. 921074-TP has been sent by U. S. Mail this 8th day of July, 1993, to the following parties of record:

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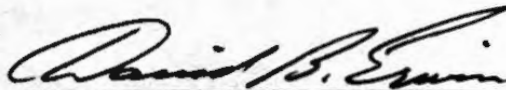
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