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**ORIGINAL
FILE COPY**

October 22, 1993

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

Re: Docket No. 921074-TP

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket on behalf of the Citizens of the State of Florida are the original and 15 copies of the Citizens' Post Hearing Statement of Issues and Positions.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

- ACK _____
- AFA 1
- APP _____
- CAF _____
- GML _____
- CTR _____
- EAG _____ Enclosures
- LEG 1
- LIN 4
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Sincerely,

Charles J. Beck
Deputy Public Counsel

DOCUMENT NUMBER-DATE

11446 OCT 22 93

7730-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Intermedia Communications)
of Florida, Inc. for Expanded Interconnection)
for AAVs within LEC Central Offices)

Docket No. 921074-TP
Filed October 22, 1993

CITIZENS' POST HEARING STATEMENT OF ISSUES AND POSITIONS

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, file this post hearing statement of issues and positions pursuant to Commission order no. PSC-93-0811-PCO-TP issued May 26, 1993.

Statement of Basic Position

Expanded interconnection for special access and private line services is in the public interest. Additional competition will lead to lower prices and greater efficiency.

Issues and positions

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

Citizens' Position: ** Yes.

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

Citizens' Position: ** Yes.

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

Citizens' Position: ** No position.

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

Citizens' Position: ** Yes. The Commission should follow the same rules promulgated by the FCC.

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

Citizens' Position: ** The four largest local exchange companies should be required to provide expanded interconnection.

Issue 8. Where should expanded interconnection be offered?

Citizens' Position: ** No position.

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

Citizens' Position: ** No position.

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

Citizens' Position: ** Yes.

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

Citizens' Position: ** No position.

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

Citizens' Position: ** Technology should not be the determining factor in the decision by this Commission to require physical collocation and/or virtual collocation.

Issue 15. If the Commission permits expanded interconnection, what pricing flexibility should the LECs be granted for special

access and private line services?

Citizens' Position: ** If allowed at all, downward pricing flexibility should only be granted for competitive services, such as DS-3. No price increases should be allowed as a result of this docket.

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

Citizens' Position: ** No position.

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

Citizens' Position: ** Yes.

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

Citizens' Position: ** No position.

Issue 20. How would ratepayers be financially affected by expanded interconnection?

Citizens' Position: ** Users of AAV services should

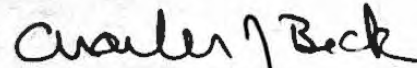
obtain lower prices and higher quality service.

Issue 21. Should the Commission grant ICI's petition?

Citizens' Position: ** Yes, but only to the extent
consistent with the other issues in this case.

Respectively submitted,

JACK SHRPVE
Public Counsel



Charles J. Beck
Deputy Public Counsel

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Attorneys for the Citizens
of the State of Florida

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

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 22nd day of October, 1993.

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