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October 22, 1993

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

Dear Mr. Tribble:

Please find an original and 15 copies of the Brief of  
Indiantown Telephone System, Inc., Northeast Florida Telephone  
Company, Quincy Telephone Company and Southland Telephone  
Company.

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AFA 1 Copies have been furnished in accordance with the  
certificate of service.

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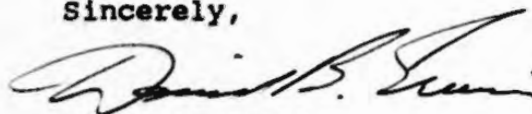
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Sincerely,



David B. Erwin

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FPSC-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 )

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Docket No. 921074-TP

Filed: October 22, 1993

ORIGINAL  
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BRIEF OF INDIANTOWN TELEPHONE SYSTEM, INC.,  
NORTHEAST FLORIDA TELEPHONE COMPANY, QUINCY  
TELEPHONE COMPANY AND SOUTHLAND TELEPHONE COMPANY

Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company (non-Tier I or small, rural LECs), pursuant to Rule 25-22.056, F.A.C., and the directive of the Florida Public Service Commission (Commission), file this post-hearing brief, in order to request that the Commission address the concerns of the small, rural, non-Tier I LECs in the matter of expanded interconnection for special access.

PROCEEDINGS TO DATE

This docket resulted from a petition filed by an AAV seeking an order that would permit the provision of authorized AAV services through collocation arrangements in LEC central offices. Before the Commission could address the petition, the Commission felt that broader questions regarding private line and special access expanded interconnection had to be resolved. Hence, this proceeding was initiated, and further proceedings involving switched access issues will be addressed in the near future. Such switched access issues did not need to be resolved to address the Intermedia petition.

Hearings on the special access interconnection issues were held beginning on September 13, 1993.

**POSITION OF INDIANTOWN TELEPHONE SYSTEM, INC.,  
NORTHEAST FLORIDA TELEPHONE COMPANY, QUINCY  
TELEPHONE COMPANY and SOUTHLAND TELEPHONE COMPANY**

In the Prehearing Statement filed by Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company, the companies set forth their basic position, and that position is reiterated here. Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company believe that it would be contrary to the public interest to impose a requirement on them to permit physical collocation on the same terms as large, Tier I LECs, which have 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 favor a process that allows negotiation with any entity that makes a bona fide request for interconnection, so that needs and service provided can be addressed on a case-by-case basis.

Insofar as positions on individual issues are concerned, Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company incorporate by reference those positions set forth in their Prehearing Statement, filed on July 8, 1993.

**ARGUMENT**

John Carroll of Northeast Florida Telephone Company

testified on behalf of Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company that the companies he was representing have a comparatively small number of access lines and serve rural areas that do not have highly concentrated subscribers. No witnesses disputed the fact that these small, non-Tier I LECs are unlikely to attract competitive access providers. In fact, to date, no AAV in the country has sought collocation with a non-Tier I LEC. (TR 175, Witness Canis)

Under such circumstances there is absolutely no reason to impose upon non-Tier I LECs requirements that might be imposed on Tier I LECs, such as filing tariffs or being obligated to provide physical collocation. The request of one AAV that the Commission establish the terms and conditions for collocation for all LECs, at this time, as a result of this proceeding (TR 274-275, Witness Kouroupas), is not only unnecessary but is unwise. As admitted by Witness Canis, "...small LECs may have unique concerns quite different from the large ones and ... an appropriate collocation arrangement may in fact have to be individually negotiated." (TR 171)

Generally, Witness Canis recommended that non-Tier I LECs be obligated to respond to bona fide requests for collocation, that negotiation then occur and that the Commission act as an arbiter on a case-by-case basis, if negotiations should fail (TR 118, 172). Witness Canis sees no need for the establishment of the details of such a regulatory scheme or the artificial imposition of any restrictions. (TR 172, 174).

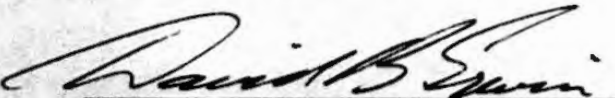
There are three possibilities:

- 1) Treat Tier I and non-Tier I LECs the same.
- 2) Exclude non-Tier I LECs from the reach of any Commission order (as was done by the FCC).
- 3) Adopt a middle ground, such as that proposed by Witness Canis, which would provide non-Tier I LECs with needed flexibility in the event of an AAV or other entity's request to collocate.

CONCLUSION

Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company urge the Commission to recognize the differences between the Tier I LECs and Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company and to adopt a regulatory scheme that allows for flexibility in the event that a request to collocate is ever received.

Respectfully submitted,



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Quincy Telephone Company  
Southland Telephone Company

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the Brief of Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company has been sent by U. S. Mail or hand delivery this 22nd day of October, 1993 to the following parties of record:

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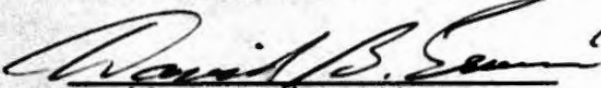
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