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November 4, 1993

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

Re: Docket No. 921074-TP

Dear Mr. Tribble:

Enclosed for filing in the above docket is an original and fifteen (15) copies of Teleport Communications Group's proposed issues for the switched access portion of this docket. Also enclosed is a Wordperfect 5.1 diskette containing the filing.

A copy of this letter is enclosed. Please date-stamp the copy to indicate the original was received and return it to me.

Please call me at 718-983-2939 if you have any questions. Thank you for processing this filing.

Sincerely,

Jodie L. Donovan  
Regulatory Counsel

cc: Service List

- ACK
- AFA 1
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU (circled)
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
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- LI 4
- OP \_\_\_\_\_
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11941 NOV-58

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition of Intermedia )  
Communications of Florida, Inc. )  
for expanded interconnection for ) Docket No. 921074-TP  
AAVs within LEC central offices. ) Phase II

Proposed Issues for Switched Access Expanded Interconnection

Teleport Communications Group Inc. ("TCG") believes that many of the issues related to expanded interconnection for special access and switched access services are the same, particularly the issues of interconnection architecture, parties that must provide expanded interconnection, parties entitled to expanded interconnection, and standards for interconnection arrangements such as space allocation and exhaustion. Therefore, the Commission has already addressed these issues in Phase I and should simply mirror its findings on these issues in Phase II.

TCG, therefore, respectfully submits the following issues which apply specifically to switched access expanded interconnection.

1. Is expanded interconnection for switched access in the Public Interest?
2. How do the FCC's orders in Phase I and Phase II of CC Docket No. 91-141 impact the Commission's ability to order expanded interconnection for switched access services?
3. As a practical matter, is it possible for the Commission to not allow switched access interconnection once the FCC's switched local transport policy is in effect?
4. Should the same basic rate structure be used for switched access interconnection as was used for special access interconnection?
5. Should the same tariffing standards and rates apply to switched access interconnection as for special access expanded interconnection?
6. Should the LECs be granted pricing flexibility for switched access services if expanded interconnection for these services is ordered?
7. Should the Commission apply standards to LEC reconfiguration charges to ensure that they are non-discriminatory?

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8. If switched access interconnection is mandated, should the Commission establish a "fresh look" policy, as the FCC has done, to ensure customers can take advantage of alternative providers of switched access services?

Respectfully submitted,



Jodie L. Donovan  
Regulatory Counsel  
Teleport Communications Group  
One Teleport Drive, Suite 301  
Staten Island, NY 10311  
718-983-2939

Dated: November 5, 1993