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December 22, 1993

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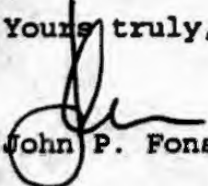
Mr. Charles Murphy
Division of Legal Services
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Petition of Intermedia Communications of
Florida, Inc. for Expanded Interconnection
for AAVs within LEC Central Offices; Phase II
Docket No. [REDACTED]

Dear Charlie:

Per your request, I have reexamined United/Centel's Positions on Issues 1, 4, 5, 12, 15 and 18 in an effort to see if those Positions could be condensed to fit within the Commission's fifty-words-or-less rule for Post Hearing Statements. Attached is the product of my efforts. These revised Position, except the Companies' Position on Issue 12 which was only fifty-two words long to begin with, now come within the fifty-word limitation. If you deem these revisions satisfactory for the fifty-word-or-less rule, you can disregard the Companies' request for a waiver of the rule.

I appreciate your bringing this matter to my attention, and I understand your concerns about potential disparate treatment. It certainly was not the Companies' intention to seek or receive special treatment. If you have any questions, please do not hesitate to call me.

Yours truly,

John P. Fons

ACK
AFA
APP
CAF
CMV
CTR
EAG
LEG
LIN
OPC
RCH
SEC
WAS
OTH

JPF/csu
Attachment

cc: Director, Records & Reporting

DOCUMENT NUMBER-DATE
13662 DEC 22 8
FPSC-RECORDS/REPORTING

UNITED/CENTEL'S REVISED POSITION ON
ISSUES TO COMPLY WITH FIFTY-WORD RULE

1. Yes. Although competition in the provisioning of special access and private line services will benefit consumers in the long-run with product innovation, higher quality service, network diversity and lower prices, consumers will be disadvantaged by such competition unless the Company is granted pricing flexibility.
4. Chapter 364, Florida Statutes, appears to allow the FPSC to require expanded interconnection. However, Section 364.335, Florida Statutes, limits the Commission as to the types of services for which expanded interconnection can be required.
5. Yes. Mandatory physical collocation constitutes a taking of the LEC's property requiring compensation which can only be awarded by a court. Because the FPSC is a legislative agency, it lacks the authority to meet the required constitutional protection.
12. [No change. Only fifty-two words.]
15. Because of the cross-elasticity between switched and special access services, pricing flexibility should not be limited to special access and private line services. In order to allow the Company to compete based on its economic costs, switched access price reductions and pricing flexibility are necessary.

18. The central office investment used in the provision of local switching is allocated in the jurisdictional separations process using Dial Equipment Minutes. As the toll/access minutes are moved from the switched network to dedicated special access, the local allocation of these investments and related expenses will increase.