

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Inter-)
connection Phase II and)
Local Transport Restructure)

DOCKET NO. ~~921074-TP~~
Filed: July 22, 1994

PREHEARING STATEMENT

Northeast Florida Telephone Company, Inc. (hereinafter Northeast) and Quincy Telephone Company (hereinafter Quincy), through their undersigned attorneys pursuant to Rule 25-22.038(3), F.A.C., file this prehearing statement:

a) Witnesses - John Carroll has prefiled testimony on behalf of Northeast and Quincy.

b) Exhibits - None

c) Basic Position - It would be contrary to the public interest to impose a requirement on small, rural LECs to permit physical collocation under the same circumstances imposed on LECs with vastly greater annual revenues, urban service areas and immediate competitive pressures.

d, e, f) Issues - Order No. PSC-94-0277-PCO-TL, set forth issues for this docket. The positions of Northeast and Quincy with regard to said issues are as follow:

ISSUE 1 - How is switched access provisioned and priced
Can you
today?

POSITION ON ISSUE 1 - Northeast and Quincy have no position.

ISSUE 2 - How is local transport structured and priced
today?

POSITION ON ISSUE 2 - On a distance sensitive minute of use basis.

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ISSUE 3 - Under what circumstances should the Commission impose the same or different forms and conditions of expanded interconnection than the F.C.C.?

POSITION ON ISSUE 3 - The terms and conditions should be the same as the F.C.C.

ISSUE 4 - Is expanded interconnection for switched access in the public interest? (The following should be discussed within this issue: Potential separations impact; potential revenue impact on LECs, their ratepayers and potential competitors; potential ratepayer impact.)

POSITION ON ISSUE 4 - It is not in the public interest for the non-Tier 1 LECs. Also, see the basic position of Quincy and Northeast.

ISSUE 5 - Is the offering of dedicated and switched services between non-affiliated entities by non-LECs in the public interest?

POSITION ON ISSUE 5 - No.

ISSUE 6 - Does Chapter 364, Florida Statutes, allow the Commission to require expanded interconnection for switched access?

POSITION ON ISSUE 6 - Northeast and Quincy have no position on this issue.

ISSUE 7 - Does a physical collocation mandate raise federal or state constitutional questions about the taking or confiscation of LEC property?

POSITION ON ISSUE 7 - Yes.

ISSUE 8 - Should the Commission require physical and/or virtual collocation for switched access expanded interconnection?

POSITION ON ISSUE 8 - Not for the non-Tier 1 LECs.

ISSUE 9 - Which LECs should provide switched access expanded interconnection?

POSITION ON ISSUE 9 - Only the Tier 1 LECs.

ISSUE 10 - From what LEC facilities should expanded interconnection for switched access be offered? Should expanded interconnection for switched access be required from all such facilities?

POSITION ON ISSUE 10 - Not from the Non-Tier 1 LECs.

ISSUE 11 - Which entities should be allowed expanded interconnection for switched access?

POSITION ON ISSUE 11 - Northeast and Quincy have no position on issue 11.

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

POSITION ON ISSUE 12 - Yes.

ISSUE 13 - Should the Commission allow switched access expanded interconnection for non-fiber optic technology?

POSITION ON ISSUE 13 - Northeast and Quincy have no position on issue 13.

ISSUE 14 - Should all switched access transport providers be required to file tariffs?

POSITION ON ISSUE 14 - Yes, as long as the LECs have to do so.

ISSUE 15 - Should the proposed LEC flexible pricing plans for private line and special access services be approved?

POSITION ON ISSUE 15 - Northeast and Quincy have no position on issue 15.

ISSUE 16 - Should the LECs proposed intrastate private line and special access expanded interconnection tariffs be approved?

POSITION ON ISSUE 16 - Northeast and Quincy have no position on issue 16.

ISSUE 17 - Should the LECs proposed intrastate switched access interconnection tariffs be approved?

POSITION ON ISSUE 17 - Northeast and Quincy have no position on issue 17.

ISSUE 18 - Should the LECs be granted additional pricing flexibility? If so, what should it be?

POSITION ON ISSUE 18 - Yes.

ISSUE 19 - Should the Commission modify its pricing and rate structure regarding switched transport service?

a) With the implementation of switched expanded interconnection.

b) Without the implementation of switched expanded interconnection.

POSITION ON ISSUE 19 - a) Yes. b) Yes.

ISSUE 20 - If the Commission changes its policy on the pricing and rate structure of switched transport service, which of the following should the new policy be based on:

a) The intrastate pricing and rate structure of local

transport should mirror each LEC's interstate filing, respectively.

b) The intrastate pricing and rate structure of local transport should be determined by competitive conditions in the transport market.

c) The intrastate pricing and rate structure of local transport should reflect the underlying cost based structure.

d) The intrastate pricing and rate structure of local transport should reflect other methods.

POSITION ON ISSUE 20 - The new policy should be based on b), above, and the intrastate pricing and rate structure of local transport should be determined by competitive conditions in the transport market.

ISSUE 21 - Should the LECs proposed local transport restructure tariffs be approved? If not, what changes should be made to the tariffs?

POSITION ON ISSUE 21 - Northeast and Quincy have no position on issue 21.

ISSUE 22 - Should the Modified Access Based Compensation (MABC) agreement be modified to incorporate a revised transport structure (if local transport restructure is adopted) for intralata toll traffic between LECs?

POSITION ON ISSUE 22 - No.

ISSUE 23 - How should the Commission's imputation guidelines be modified to reflect a revised transport structure (if local

transport restructure is adopted)?

POSITION ON ISSUE 23 - This is not applicable to Northeast and Quincy.

ISSUE 24 - Should these dockets be closed?

POSITION ON ISSUE 24 - Yes.

g) Stipulations - Northeast and Quincy have not stipulated to any issues.

h) Pending motions - Neither Northeast nor Quincy seeks any action on any motions.

i) Northeast and Quincy are not unable to comply with any requirements of the Order Establishing Preliminary Issues and Addressing Other Procedural Matters.

Respectfully submitted,



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CERTIFICATE OF SERVICE
Docket No. 921074-TP

I HEREBY CERTIFY that a true copy of the foregoing Pre-hearing Statement on behalf of Northeast Florida Telephone Company and Quincy Telephone Company has been furnished by U.S. Mail or by hand delivery this 22nd day of July, 1994 to the following:

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