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July 27, 1994

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IN REPLY REFER TO
Tallahassee

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: In re: Expanded Interconnection Phase II and
Local Transport Restructure; Docket Nos. 921074-TP,
930955-TL, 940014-TL, 940020-TL and 931196-TL

Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of ALLTEL Florida, Inc.'s Prehearing Statement.

We are also submitting the Prehearing Statement on the enclosed 3.5", high-density diskette generated on a DOS computer in Word Perfect 5.1 format.

ACK Please acknowledge receipt and filing of the above by stamping
AFA _____ the duplicate copy of this letter and returning the same to this
APP _____ writer.
CAF _____

CMU *Reith* Thank you for your assistance in this matter.

CTR _____
EAG _____
LEG *Cargano* _____
LIN *H* _____
OFC _____
ROC _____
SE _____
W S _____
OTn _____

RECEIVED & FILED
FPSC-BUREAU OF RECORDS

Sincerely,

J. Jeffrey Wahlen
J. Jeffrey Wahlen

DOCUMENT NUMBER-DATE
07663 JUL 27 1994
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection) Docket Nos. 921074-TP,
Phase II and Local Transport) 930955-TL, 940014-TL,
Restructure) 940020-TL, and 931196-TL
_____) Filed: July 27, 1994

ALLTEL FLORIDA, INC.'S
PREHEARING STATEMENT

Pursuant to Order No. PSC-94-0277-PCO-TL, ALLTEL Florida, Inc. ("ALLTEL" or the "Company"), through its undersigned counsel, files its Prehearing Statement.

A. WITNESS: ALLTEL will sponsor the direct testimony of Harriet E. Eudy (filed 7/15/94) on issues 9 and 19-23.

B. EXHIBITS: ALLTEL will sponsor the exhibit of Harriet E. Eudy (HEE-1) attached to her direct testimony.

C. STATEMENT OF BASIC POSITION: ALLTEL has no position on the issues in this case as they relate to Tier 1 local exchange companies. As this proceeding may relate to Tier 2 companies like ALLTEL, the FPSC's policy on expanded interconnection for switched access for alternative access vendors ("AAVs") should mirror the policy recently adopted by the FCC, i.e., expanded interconnection should not be required for Tier 2 LECs like ALLTEL.

D-G. ISSUES AND POSITIONS:

ISSUE 1: How is switched access provisioned and priced today?

POSITION: No position at this time.

DOCUMENT NUMBER-DATE

07663 JUL 27 94

FPSC-RECORDS/REPORTING

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

POSITION: No position at this time.

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: No position at this time.

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: No position at this time.

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

POSITION: No position at this time.

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

POSITION: No position at this time.

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

POSITION: Yes.

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

POSITION: No.

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

POSITION: ALLTEL has no position on this issue as it relates to Tier 1 LECs. As it relates to Tier 2 LECs like ALLTEL, the FPSC's policy on expanded interconnection for switched access should mirror the policy recently adopted by the FCC, i.e., expanded interconnection should not be required for Tier 2 LECs like ALLTEL.

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: No position at this time.

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

POSITION: No position at this time.

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

POSITION: No position at this time.

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

POSITION: No position at this time.

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

POSITION: No position at this time.

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

POSITION: No position at this time.

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

POSITION: No position at this time.

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

POSITION: No position at this time.

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

POSITION: No position at this time.

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: No position at this time.

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: No position at this time.

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

POSITION: No position at this time.

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: No position at this time.

ISSUE 23: How should the Commission's imputation guidelines be modified to reflect a revised transport structure (if local transport restructure is adopted)?

POSITION: No position at this time.

ISSUE 24: Should these dockets be closed?

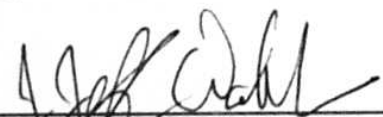
POSITION: No position at this time.

H. STIPULATIONS: ALLTEL is not aware of any issues that have been stipulated.

I. PENDING MOTIONS: ALLTEL is not aware of any pending motions by ALLTEL.

J. COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE: ALLTEL does not know of any requirement of the Order on Prehearing Procedure with which it cannot comply.

DATED this 27th day of July, 1994.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 27th day of June, 1994, to the following:

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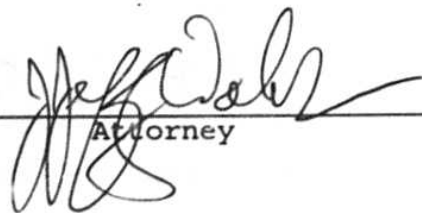
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