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October 11, 1994

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**VIA FEDERAL EXPRESS**

Mr. Steven C. Tribble  
Florida Public Service Commission  
101 E. Gaines Street  
Tallahassee, Florida 32301

Re: Docket Nos. 921074-TP; 930955-TL; 940014-TL;  
940020-TL; 931196-TL; and 94190-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket are an original and fifteen (15) copies of the Post-Hearing Statement of Issues and Positions and the post-hearing Brief of the Interexchange Access Coalition.

Also enclosed is a copy of each document on 5 1/4" computer diskette.

Please acknowledge receipt and filing of the above by date-stamping the duplicate copy of this letter and returning the same to me. Thank you for your kind assistance.

- ACK
- AFA
- APP
- CAF

Sincerely,

Brad E. Mutschelknaus

CMID *Reith*

- CTR
- EAG
- LEG *Canzano*
- LIN *at*
- OPC
- RCH
- SEC
- WAS
- OTH

Enclosures

BEM:rw

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EPSC BUREAU OF RECORDS

*Brief*  
DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

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FPSC-RECORDS/REPORTING

Before the  
FLORIDA PUBLIC SERVICE COMMISSION  
Tallahassee, Florida

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In re: Petition for Expanded )  
Interconnection for Alternative )  
Access Vendors Within Local Exchange )  
Company Central Offices by )  
Intermedia Communications of Florida. )

DOCKET NO. 921074-TP

In re: Request by United Telephone )  
Company of Florida for Approval of a )  
Proposed Tariff Restructuring the )  
Switched Access Local Transport Element )

DOCKET NO. 940014-TL

In re: Request by Central Telephone )  
Company of Florida for Approval of a )  
Proposed Tariff Restructuring the )  
Switched Access Local Transport Element )

DOCKET NO. 940020-TL

In re: Request by General Telephone )  
Company of Florida for Approval of a )  
Proposed Tariff Restructuring the )  
Switched Access Local Transport Element )

DOCKET NO. 940190-TL

In re: Request by Southern Bell )  
Telephone and Telegraph Company for )  
Approval of a Proposed Tariff )  
Restructuring the Switched Access )  
Local Transport Element. )

DOCKET NO. 930955-TL

**INTEREXCHANGE ACCESS COALITION  
POST-HEARING STATEMENT OF ISSUES AND POSITIONS**

Pursuant to Rule 25-22.056(3), Florida Administrative Code,  
the Interexchange Access Coalition ("IAC"), by its attorneys,  
hereby files its Post-Hearing Statement of Issues and Positions  
in the above-captioned proceeding.

**A. Basic Position**

IAC does not oppose the LECs' proposed LTR tariff structure.  
However, the price differences among the transport options must  
reflect only the cost difference of providing them. IAC believes

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that the LECs' proposed rate levels must be adjusted to prevent the LECs from engaging in unreasonable price discrimination.

**B. Issues and Positions**

**Issue: 1.** How is switched access provisioned and priced today?

**IAC Position:** \* Under the current "equal charge"/"EAEA" switched access transport rate structure, IXCs may order either direct routed or tandem routed switched access. Regardless of the configuration or the mileage, the intrastate transport price is equivalent per minute of use.\*

**Issue: 2.** How is local transport structured and priced today.

**IAC Position:** \* Today intrastate transport charges are equivalent per minute of use regardless of network configuration or transport distance. Interstate transport service has been restructured, similar to the restructure proposed in Florida by the LECs. DS1 and DS3 dedicated transport is flat-rated, while common TST transport is priced on a usage sensitive basis.\*

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

**IAC Position:** \* IAC takes no position.\*

**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.)

**IAC Position: \* IAC takes no position.\***

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

**IAC Position: \* IAC takes no position.\***

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

**IAC Position: \* IAC takes no position.\***

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

**IAC Position: \* IAC takes no position.\***

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

**IAC Position: \* IAC takes no position.\***

**Issue: 9.** Which LECs should provide switched access expanded interconnection?

**IAC Position: \* IAC takes no position.\***

**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?

**IAC Position: \* IAC takes no position.\***

**Issue: 11.** Which entities should be allowed expanded interconnection for switched access?

**IAC Position: \* IAC takes no position.\***

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

**IAC Position: \* IAC takes no position.\***

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

**IAC Position: \* IAC takes no position.\***

**Issue: 14.** Should all switched access transport providers be required to file tariffs?

**IAC Position: \* Yes.\***

**Issue: 15.** Should the proposed LEC flexible pricing plans for private line and special access service be approved?

**IAC Position: \* IAC takes no position.\***

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

**IAC Position: \* IAC takes no position.\***

**Issue: 17. Should the LECs proposed intrastate switched access interconnection tariffs be approved?**

**IAC Position: \* IAC takes no position.\***

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

**IAC Position: \* There is insufficient competition today for the provision of switched access transport service to justify granting LEC pricing flexibility for switched access services. The Commission should separately consider, however, whether some pricing based on identifiable cost differences is a reasonable pricing strategy.\***

**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.**

**IAC Position:** \* IAC does not object to the LECs' proposal to restructure switched transport rates, but IAC objects strenuously to the LECs' proposed initial pricing of the restructured switched transport services because they are not cost-based.\*

**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.

**IAC Position:** \*IAC believes that the pricing of local transport must reflect the underlying costs incurred by the LEC in providing the service. Non-cost based rates, discriminate among access customers and would disrupt interexchange competition. Thus, both market-based pricing, and mirroring of non-cost based interstate rates is inappropriate.\*

**Issue: 21.** Should the LEC's proposed local transport restructure tariffs be approved? If not, what changes should be made to the tariffs?

**IAC Position:** \* The LECs' proposed local transport restructure tariffs should not be approved. The Commission must examine the underlying costs for the three transport options and require that LEC rates be modified to reflect these costs.\*

**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?

**IAC Position:** \* Yes. If LTR is appropriate for charging access to IXCs, it also is proper for inter-LEC arrangements.\*

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

**IAC Position:** \* The LECs should be required to impute the rates for tandem switched transport ("TST") until such time as they demonstrate that the actual routing of their toll traffic is otherwise.\*

- a. Should the Commission modify the Phase I order in light of the decision by the United States Court of Appeals for the District of Columbia Circuit?

**IAC Position:** \* IAC takes no position.\*



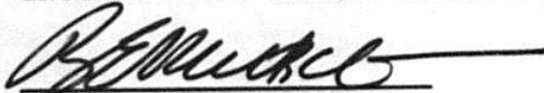
**Issue: 24. Should these dockets be closed?**

**IAC Position: \* The Commission should schedule workshops to consider how the LECs should impute access charges into their toll rates under the new LTR structure and how LTR should be integrated into MABC.\***

Respectfully submitted,

**INTEREXCHANGE ACCESS COALITION**

By:



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