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**AT&T**

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September 29, 1995

ORIGINAL  
FILE COPY

Mrs. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 950737-TP

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket  
are an original and fifteen (15) copies of AT&T's  
Prehearing Statement.

Copies of the foregoing are being served on all parties  
of record in accordance with the attached Certificate of  
Service.

Yours truly,

  
Michael W. Tye

Attachments

cc: J. P. Spooner, Jr.  
Parties of Record

- CK
- FA
- PP
- AF
- MU
- TR
- AG
- EG
- JN
- DPC
- ROH
- SEC
- WAS
- OTH

DOCUMENT NUMBER-DATE  
09672 SEP 29 1995  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into )  
Temporary Local Telephone ) DOCKET NO. 950737-TP  
Number Portability Solution )  
to Implement Competition in ) FILED: Sept. 29, 1995  
Local Exchange Telephone )  
Markets. )  
\_\_\_\_\_ )

AT&T'S PREHEARING STATEMENT

AT&T Communications of the Southern States, Inc.  
(hereinafter "AT&T"), pursuant to Rule 25-22.038, Florida  
Administrative Code, and order of the Florida Public Service  
Commission (hereinafter the "Commission") hereby submits its  
Prehearing Statement in the above-referenced docket.

A. Witness

AT&T intends to sponsor the testimony of the following  
witness:

1. Mike Guedel: Mr. Guedel's direct testimony  
primarily responds to Issues 3, 4, 5 and 8. The  
purpose of the testimony is to recommend a methodology  
for establishing a rate level for interim number  
portability provided through the Remote Call Forwarding  
arrangement. Mr. Guedel recommends that the price be  
set at the level of the Total Service Long Run  
Incremental Cost (hereinafter "TSLRIC") that the LEC  
incurs in providing the service.

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09672 SEP 29 88

FPSC-RECORDS/REPORTING

AT&T further reserves the right to call any additional witnesses and present any additional evidence that might be necessary to respond to matters which are raised for the first time at the hearings in this docket.

**B. Exhibits.**

The direct testimony of Mr. Guedel contains the following exhibit:

Guedel Ex. I  
Relative Advantages and Disadvantages of Remote  
Call Forwarding and Flex DID as Temporary Number  
Portability Solutions

AT&T further reserves the right to introduce any additional exhibits that may be necessary to cross-examine opposing witnesses or to respond to matters that are raised for the first time at the hearings in this docket.

**C. Basic Position.**

AT&T agrees with the industry conclusion (evidenced in the stipulation approved by the Commission in this docket) that temporary number portability should be provided through Remote Call Forwarding. The non-recurring costs associated with that solution include the labor time involved with receiving the service order, the transmission of the service order to the switching employee, and the writing of the translation. The recurring costs associated with that solution include the switching costs associated with the set up and maintenance of additional calls through the LEC

central offices and the transport costs associated with the facilities utilized in forwarding the call to the recipient company. The rate structure for this arrangement should consist of a single rate element billed by the provider of the number portability service to the LEC receiving the ported number. The rate should be set at the TSLRIC that the LEC incurs in providing the service. No additional mark-up should be allowed. The LEC should be permitted to recover the costs that it incurs in providing number portability, but it should not be allowed to exact any additional premium from potential competitors simply for the right to do business in its territory.

D. Fact Issues.

See Attachment 1 (AT&T's Positions on Issues).

E. Legal Issues.

See Attachment 1 (AT&T's Positions on Issues).

F. Policy Issues.

See Attachment 1 (AT&T's Positions on Issues).

G. Position on Issues.

See Attachment 1 (AT&T's Positions on Issues).

H. Stipulated Issues.

See Attachment 1 (AT&T's Positions on Issues).

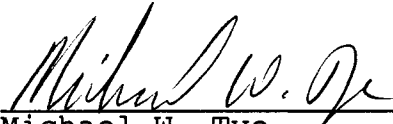
I. Pending Motions.

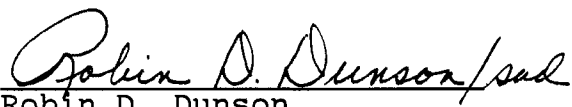
AT&T is not aware of any pending motions.

J. Other Requirements.

AT&T is not aware of any requirements set forth in the Order on Prehearing Procedure with which it is unable to comply.

Respectfully submitted this 29th day of September,  
1995.

  
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SOUTHERN STATES, INC.

**AT&T's Prehearing Statement  
Docket No. 950737-TP  
Attachment 1**

**AT&T's POSITIONS ON ISSUES**

**ISSUE 1:** What is the definition of temporary number portability pursuant to Section 364.16(4), Florida Statutes?

**AT&T'S POSITION:** There are three concepts of number portability: 1) Service Provider Portability; 2) Location Portability; and 3) Service Portability. Service Provider Portability allows a user to keep her/his telephone number at his/her current location when selecting a new service provider. Location Portability allows a user to take his/her telephone number when moving to a new local service area. Service Portability allows the user to keep her/his telephone number when changing services (i.e., POTS to ISDN).

The concept of Service Provider Portability best meets the statutory goal of temporary number portability as set forth in Section 364.16(4), Florida Statutes.

**AT&T'S WITNESS:** Mike Guedel

**ISSUE 2:** What technical solutions will be available by January 1, 1996, to provide temporary number portability?

**AT&T'S POSITION:** The industry number portability standards group identified two viable alternatives for the provision of temporary number portability: 1) Remote Call Forwarding and 2) Flexible DID. The group concluded that although Remote Call Forwarding is not an appropriate solution to the issue of permanent number portability, it is one of the most practical interim solutions and agreed that its implementation should be mandatory. AT&T agrees with the industry conclusion.

**AT&T'S WITNESS:** Mike Guedel

**ISSUE 3:** What are the advantages and disadvantages of each solution identified in Issue 2?

**AT&T'S POSITION:** As part of their work effort, the industry number portability standards group developed a description of the advantages and disadvantages of the respective interim solutions. A description of the advantages and disadvantages of two potential interim solutions, Remote Call Forwarding and Flex DID, are attached to the testimony of Mike Guedel filed in this proceeding.

**AT&T'S WITNESS:** Mike Guedel

**ISSUE 4:** What costs are associated with providing each solution identified in Issue 2?

**AT&T'S POSITION:** The non-recurring costs associated with the provision of number portability (in a Remote Call Forwarding arrangement) include the labor time involved in receiving the service order, the transmission of the service order to the switching employee, and the writing of the translation.

The recurring costs associated with the provision of number portability (in a Remote Call Forwarding arrangement) include the switching costs associated with the set up and maintenance of additional calls through the LEC Central Offices and the transport costs associated with the facilities utilized in forwarding the call to the recipient company.

**AT&T'S WITNESS:** Mike Guedel

**ISSUE 5:** How should the costs identified in Issue 4 be recovered?

**AT&T'S POSITION:** AT&T concurs in the stipulated industry agreement that the recurring costs should be recovered on a per-line, per-month basis.

**AT&T'S WITNESS:** Mike Guedel

**ISSUE 6:** What is/are the most appropriate method(s) of providing temporary number portability?

**AT&T'S POSITION:** See AT&T's Position on Issue No. 2 above.

**AT&T'S WITNESS:** Mike Guedel

**ISSUE 7:** What are the appropriate parameters, costs and standards for the method(s) identified in Issue 6?

**AT&T'S POSITION:** : See AT&T's positions on Issues Nos. 1, 2, 4, and 5 above, and the industry stipulation approved by the Commission on September 12, 1995.

**AT&T'S WITNESS:** Mike Guedel

**ISSUE 8:** Should the docket be closed?

**AT&T'S POSITION:** No. The docket should remain open to determine a permanent number portability solution.

**AT&T'S WITNESS:** Mike Guedel



CERTIFICATE OF SERVICE

DOCKET NO. 950737-TP

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand-delivery to the following parties of record this 29<sup>th</sup> day of September, 1995:

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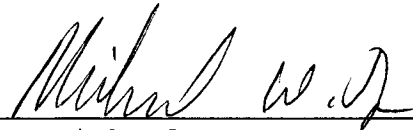
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