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Florida Cable Telecommunications Association

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Steve Wilkerson, President

September 29, 1995

**VIA HAND DELIVERY**

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

**RE: DOCKET NO. 950737-TP**

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are an original and fifteen copies of Florida Cable Telecommunications Association, Inc.'s ("FCTA") Prehearing Statement. Copies have been served on the parties of record pursuant to the attached certificate of service.

Also enclosed is a copy on a 3-1/2" diskette in WordPerfect format, version 5.1.

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 assistance in processing this filing.

Yours very truly,



Laura L. Wilson  
Regulatory Counsel

Enclosures

cc: Mr. Steven E. Wilkerson  
All Parties of Record

DOCUMENT NUMBER-DATE

310 North Monroe Street • Tallahassee, Florida 32301 • (904) 681-1990 FAX (904) 681-9676 **09679 SEP 29 1995**

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into Temporary )  
Local Telephone Number Portability )  
Solution to Implement Competition )  
in Local Exchange Telephone Markets )  
\_\_\_\_\_ )

DOCKET NO. 950737-TP

FILED: September 29, 1995

**FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION, INC.'S**  
**PREHEARING STATEMENT**

The Florida Cable Telecommunications Association, Inc. ("FCTA") pursuant to Order No. PSC-95-0896-PCO-TP and Rule 25-22.038(3), Florida Administrative Code, respectfully submits the following Prehearing Statement in the above-captioned docket.

**A. WITNESSES**

FCTA does not intend to present any witnesses.

**B. EXHIBITS**

FCTA is not able to identify any exhibits at this time.

**C. BASIC POSITION**

The new law recognizes that number portability is an essential element of local exchange competition in Florida. Thus, the main issue left to resolve in this proceeding (the price for the temporary mechanism to be implemented on January 1, 1996) is a key element to promoting economic and efficient local exchange competition in Florida. Remote Call Forwarding may be the only temporary solution that can be implemented in Florida on January 1, 1996. However, it has numerous disadvantages and is not likely to support the ultimate development of full competition. The Commission should keep the essential nature of the service and its inherent disadvantages in mind when setting the prices for Remote Call Forwarding.

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FPSC-RECORDS/REPORTING

## D. ISSUES AND POSITIONS

FCTA offers the following prehearing positions on the questions of law, fact and public policy identified for disposition in this docket:

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

**POSITION:**      Stipulated.

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

**POSITION:**      Stipulated.

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

**POSITION:**      The advantages and disadvantages include:

1.      Remote Call Forwarding
  - a)      Advantages:
    - (1)      Only one translation change would be required.
    - (2)      Screening List CLASS features in customer's new central office would still work.
    - (3)      RCF does not require the addition of extra or special inter-office trunks if call volume is low.
    - (4)      RCF is available in most switches.
    - (5)      RCF supports the use of SS7 signaling.

- (6) RCF can be applied on a line-by-line basis.
- b) Disadvantages:
- (1) There would be a call set-up delay of 2 to 3 seconds.
  - (2) The actual network number (the ported number) would not be known to customers, creating confusion when calls were placed from this number to subscribers of Caller Identification. The number displayed at the far end would not be the directory number, but would be the ported number.
  - (3) RCF requires the use of two number assignments.
  - (4) The engineered capability of a given switch may pose a problem with regard to the number of call forwards the switch can support at any one time. This would depend on how many customers were assigned this option.
  - (5) Some types of calls (e.g., interLATA calls terminating through the access tandem, or local calls from the ALEC switch to the directory number which are then routed back over the same trunk) may require extra trunks, depending on call volume.
  - (6) Administration would be required to insure the appropriate RCF changes are made in the affected office when a customer moves to a new local service provider. Disconnecting numbers would also have to be tracked.

- (7) RCF for two lines would be necessary to enable call waiting for the ported customer.
- (8) The incumbent LEC would remain in the revenue stream for terminating access revenues.
- (9) For 911 purposes, it is not clear that the ported number would be able to be displayed at the Public Safety Answering Point (PSAP) in all cases, and if it is, it will require training of the PSAP operator.
- (10) CLASS features Automatic Recall and Automatic Call Back are disabled following a call to the ported number.
- (11) The Calling Port Number (CgPN) field on which CLASS features are based when the ported customer originates a call will not show the ported number and Caller ID and features that screen on Caller ID will fail. This is similar to disadvantage #2.
- (12) Second number use is inconsistent with a long term database solution.

## 2. Flex DID

### a) Advantages:

- (1) The customer would be assigned one directory number.
- (2) The customer would not use an office equipment number in the former company's central office.

b) Disadvantages:

- (1) There would be a call set-up delay of 2 or 3 seconds.
- (2) CLASS features would require changes in the STPs to associate the NXX with two different point codes on a per number basis.
- (3) This method would require changes in the access tandem office to allow for full seven digit number routing (maintaining exception lists) instead of routing by three digit NXX.
- (4) This method would require direct trunks to the former central office if the access tandem isn't able to route calls via exception lists.
- (5) This method could also require extra trunks between offices (the same as RCF) depending on call volume.
- (6) Opening the old NXX in the customer's new central office would require more translation changes.
- (7) More administration than RCF would be required for opening NXXs in two different offices and maintaining the exception lists.
- (8) DID requires end office trunking to each end office that is porting a number.
- (9) The incumbent LEC would remain in the revenue stream for access revenues.

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

**POSITION:** FCTA takes no position on this issue at this time.

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

**POSITION:** FCTA takes no position on this issue at this time.

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

**POSITION:** Stipulated.

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

**POSITION:** Stipulated.

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

**POSITION:** No. The docket should remain open for the number portability standards group to continue its work under the "direction of the Commission" as required by s. 364.16(4).

#### **E. STIPULATIONS**

FCTA is aware of no stipulations other than the Stipulation between the parties approved at the September 12, 1995 Agenda Conference.

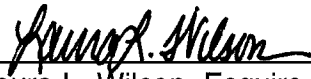
**F. PENDING MOTIONS**

FCTA has no pending motions.

**G. OTHER REQUIREMENTS**

FCTA is not aware of any other requirements of the procedural prehearing order that it cannot comply with.

**RESPECTFULLY SUBMITTED** this 29th day of September, 1995.

By:   
\_\_\_\_\_  
Laura L. Wilson, Esquire  
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**CERTIFICATE OF SERVICE**  
**DOCKET NO. 950737-TP**

I **HEREBY CERTIFY** that a true and correct copy of FCTA's Prehearing Statement has been furnished by Hand Delivery(\*) and/or U.S. Mail on this 29th day of September, 1995 to the following parties of record:

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