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BEFORE THE
FLORIDA
PUBLIC SERVICE COMMISSION

In re: Investigation into temporary)
local telephone number portability) Docket No. 950737-TP
solution to implement competition in)
local exchange telephone markets.) Date: September 29,
) 1995

PREHEARING STATEMENT OF
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.

Docket No. 950737-TP

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**PREHEARING STATEMENT OF
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.**

Docket No. 950737-TP

Pursuant to Rule 25-22.038(3), Florida Administrative Code and Order No. PSC-95-0896-PCO-TP, Metropolitan Fiber Systems of Florida, Inc. ("MFS"), by its undersigned attorneys, hereby files this prehearing statement in the Commission's proceeding concerning temporary number portability arrangements.

- (a) the name of all known witnesses that may be called by the party, and the subject matter of their testimony;**

Timothy T. Devine will testify as to the issues in this docket, with particular focus on the appropriate rate for temporary number portability.

- (b) a description of all known exhibits that may be used by the party, whether they may be identified on a composite basis, and the witness sponsoring each;**

MFS will offer as Exhibit MFS-1 the customer surveys attached at Exhibit 1 to its Direct Testimony in this docket. This exhibit will be sponsored by Mr. Devine.

- (c) a statement of basic position in the proceeding;**

MFS believes that Remote Call Forwarding ("RCF") is the best temporary number portability solution available at this time. Temporary number portability is essential to the development of local exchange competition. As a bottleneck element of local exchange service, RCF should be priced by LECs at incremental direct cost with no contribution.

- (d) MFS 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 temporary number portability pursuant to Section 364.16(4), Florida Statutes?

POSITION: Pursuant to the stipulation signed by the parties and approved by the Commission on September 12, 1995:

Temporary number portability pursuant to Section 364.16(4), Florida Statutes is defined as an end user's ability at a given location to change service from a local exchange company (LEC) to an alternative local exchange company (ALECs) or vice versa, or between two ALECs, without changing their local telephone number. This is typically known as service provider temporary number portability.

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

POSITION: Pursuant to the stipulation signed by the parties and approved by the Commission on September 12, 1995:

The only technical solution that will be available by January 1, 1996 is remote call forwarding. However, the parties agree that the LECs will continue to negotiate with the ALECs who desire to utilize Flexible Direct Inward Dialing or any other feasible option to provide temporary number portability that may be developed in the future.

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

POSITION: Disadvantages: RCF and other interim number portability solutions require that all calls be routed to the LEC switch before they can be forwarded to MFS, resulting in additional transmission and switching expense and call set-up

time. It also appears that BLV/I and some CLASS features are not available when utilizing RCF.

Advantages: RCF provides the critical function of permitting end users to change local service providers while retaining their existing telephone number, with virtually no impact to the incumbent LEC's customer base and network. Like any interim system, RCF is not perfect, and while a better interim solution may come about, it is in MFS's view the best currently available interim solution.

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

POSITION: There are limited direct costs to equip lines, as well as certain trunking and processing costs. LEC costs should be carefully analyzed by the Commission and the parties.

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

POSITION: In light of the Stipulation, by a per line per month charge based on incremental direct cost with no contribution.

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

POSITION: Pursuant to the stipulation signed by the parties and approved by the Commission on September 12, 1995:

Remote Call Forwarding is the most appropriate method to provide temporary number portability by January 1,

1996. The parties will continue to negotiate possible future options if a party desires a different option.

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

POSITION: Pursuant to the stipulation signed by the parties and approved by the Commission on September 12, 1995:

Implementation of Remote Call Forwarding as a temporary number portability mechanism can be implemented in most LEC central offices at the present time. This temporary mechanism used existing switch and network technology. The parties agree that the LECs shall offer Remote Call Forwarding to certificated ALECs as a temporary number portability mechanism, effective January 1, 1996. ALECs shall be required to offer Remote Call Forwarding to LECs or other ALECs as a temporary number portability mechanism, effective on the date they begin to provide local exchange telephone service. All parties will work together and with the 911 coordinators to successfully integrate the relevant ALEC information into the existing 911/E911 systems. The recurring price for Remote Call Forwarding will be on a per-line per-month basis and will be uniform throughout an individual LEC's existing service territory. The price charge by an individual LEC for Remote Call Forwarding shall not be below the costs of that LEC to provide Remote Call Forwarding for purposes of providing temporary number portability. The price charged for Remote Call Forwarding offered by an ALEC will mirror the price charged by the LEC.

ISSUE 8: Should the docket be closed?

POSITION: No. It should be left open to monitor implementation.

(g) a statement of issues that have been stipulated to by the parties;

Issues 1, 2, 6 and 7 have stipulated.

(h) a statement of all pending motions or other matters the party seeks action upon;

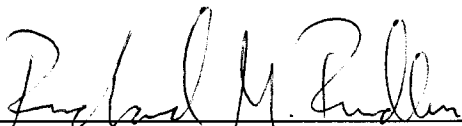
None.

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- (i) a statement as to any requirement set forth in this order that cannot be complied with, and the reasons therefor.

None.

Respectfully submitted,


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Dated: September 28, 1995

**CERTIFICATE OF SERVICE
DOCKET NO. 959737-TP**

I hereby certify that on this 29th day of September 1995, copies of Direct Testimony of Timothy Devine On Behalf Of Metropolitan Fiber Systems of Florida, Inc. were served by next day express mail on the following:

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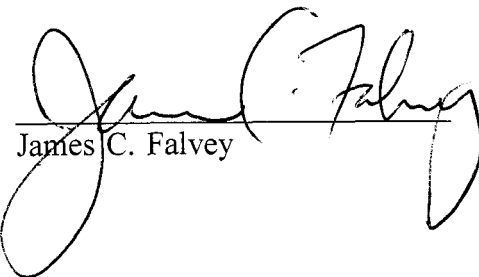
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