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September 29, 1995

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Ms. Blanca S. Bayó  
Director, Records & Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 950737-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Metro Access Transmission Services, Inc. in the above referenced docket are the original and 15 copies of MCI metro's Prehearing Statement. Our WordPerfect 5.1 disk containing the document is also enclosed.

Copies have been furnished to parties of record as indicated on the attached service list.

Very truly yours,



Richard D. Melson

RDM/cc

Enclosure

cc: Parties of Record

*Bayó*

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into	)	
temporary local telephone number	)	Docket No. 950737-TP
portability solution to	)	
implement competition in local	)	Filed: September 29, 1995
exchange telephone markets	)	
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MCI METRO ACCESS TRANSMISSION SERVICES, INC'S  
PREHEARING STATEMENT

MCI Metro Access Transmission Services, Inc. (MCImetro) hereby submits its Prehearing Statement in the above-captioned docket.

A. Known Witnesses. MCImetro has prefiled the testimony of the following witness:

Don Price	Direct	All Issues
Don Price	Rebuttal	All Issues

B. Known Exhibits. MCImetro has the following exhibits. MCImetro reserves the right to use additional exhibits for the purpose of cross-examination.

Price Direct	DGP-1	Academic and Professional Qualifications of Don Price
	DGP-2	Remote Call Forwarding via Direct Connection
	DGP-3	Remote Call Forwarding via Tandem Connection
	DGP-4	Rochester Telephone Corp. Tariff P.S.C. No. 1 - Telephone, General, Section 1, Original Page No. 11

C. Basic Position. The parties have stipulated that

Remote Call Forwarding (RCF) should be implemented as one of the methods for providing temporary service provider number portability. RCF has serious disadvantages which make it inappropriate for a long-term number portability solution. During the interim period before the adoption of a permanent data base number portability mechanism, the price for RCF should be set equal to the incremental direct cost of providing RCF for number portability purposes. The price should not include any contribution to joint and common costs. If the price did include such contribution, it would create an economic barrier to entry in addition to the technical barriers that result from the RCF arrangement itself. Including contribution in the price would also increase the incentives for the LECs to delay the implementation of a permanent number portability mechanism.

D.-F. Issues. The parties have entered a stipulation which effectively disposes of Issues 1, 2, 6, and 7. The following are MCImetro's positions on the issues identified in the Order on Prehearing Procedure that remain for resolution by the Commission after the parties' stipulation.

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

MCImetro: Remote call forwarding (RCF) is totally inappropriate as a long-term local number portability solution. The advantage of RCF as a temporary mechanism is that it is fairly simple for the LECs to implement. The disadvantages of RCF include: call blocking, call transmission degradation, unavailability of CLASS features, limitation to 32 simultaneous calls, accelerated exhaust of available central office codes,

additional call setup time, negative impact on the LEC's switch processor capacity, potential 911 service problems, increased customer complaints, uneconomic trunking requirements, IXC third party billing problems, limitations on operator services, and the requirement for additional AMA recording equipment. Most of these deficiencies arise from the fact that the LEC will remain in the call processing path of every call to the ported customer.

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

MCImetro: The types of incremental direct costs fall into two categories, recurring and nonrecurring. The recurring costs are primarily the carrying cost of the dedicated equipment needed to perform the call forwarding and the cost of some additional trunking facilities and processor time. The nonrecurring costs are the costs of labor to enter a service order and to implement the number translation. MCI takes no position on the specific amount of these costs pending completion of discovery.

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

MCImetro: The incremental direct costs of providing RCF in a number portability context should be recovered through a nonrecurring service order charge and a recurring monthly charge for each ported number associated with a directory listing. These charges should be set equal to the incremental direct cost (including a reasonable return), but should not include any mark-up for contribution toward joint and common costs. This pricing is appropriate to reflect that RCF is essentially a monopoly input into the ALEC's service offering and to avoid giving the LECs an additional financial incentive to delay the implementation of a permanent data base number portability solution.

Issue 8. Should the docket be closed?

MCImetro: No. This docket should remain open to resolve any implementation issues that may arise, to resolve any issues that may arise regarding the use of flexible DID

as an alternative interim portability mechanism, and to consider the appropriate long-term solution for providing true service provider local number portability.

H. Stipulations. The parties have entered a stipulation which effectively disposes of the matters identified as Issues 1, 2, 6, and 7 in the Order on Prehearing Procedure.

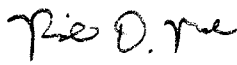
I. Pending Motions. MCImetro does not have any pending motions that require action by the Prehearing Officer.

J. Requirements of Order. MCImetro believes this prehearing statement is fully responsive to the requirements of the Order on Prehearing Procedure.

RESPECTFULLY SUBMITTED this 29th day of September, 1995.

HOPPING GREEN SAMS & SMITH, P.A.

By:

  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by hand delivery (\*\*) or next business day delivery by UPS (\*) this 29th day of September, 1995.

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