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REPLY TO:
 P.O. BOX 10095
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September 29, 1995

ORIGINAL FILE COPY

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

via Hand Delivery

Re: Resolution of Petition(s) to establish 1995 rates, terms, and conditions for interconnection involving local exchange companies and alternative local exchange companies pursuant to Section 364.162, Florida Statutes; Docket No. 950985-TP

Dear Ms. Bayo:

Enclosed for filing please find an original and fifteen copies of Time Warner AxS of Florida, L.P.'s and Digital Media Partners' Prehearing Statement for the above-referenced docket. You will also find a copy of this letter and a diskette in Word Perfect 5.1 format enclosed. Please date-stamp the copy of this letter to indicate that the original was filed and return to me.

If you have any questions regarding this matter, please feel free to contact me.

Respectfully,

PENNINGTON & HABEN, P.A.

Peter M. Dunbar

- ACK _____
- AFA _____
- APP _____
- CAS _____
- CHD _____
- CIP _____
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- OND _____
- ROH _____
- SEC _____
- WAS _____
- OTH _____

PMD/tmz
 Enclosures

cc: All Parties of Record (w/ enclosure)

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CERTIFICATE OF SERVICE
DOCKET NO. 950985-TP

I HEREBY CERTIFY that a true and correct copy of Time Warner AxS of Florida, L.P.'s and Digital Media Partners' Prehearing Statement has been served by either *Federal Express or Hand Delivery on this 29th day of September, 1995, to the following parties of record:

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for

PETER M. DUNBAR, ESQ.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Resolution of Petition(s)) Docket No. 950985-TP
to establish nondiscriminatory) Filed: September 29, 1995
rates, terms, and conditions for)
interconnection involving local)
exchange companies and alternative)
local exchange companies pursuant)
to Section 364.162, Florida Statutes)
_____)

PREHEARING STATEMENT BY TIME WARNER AXS OF FLORIDA, L.P.
AND DIGITAL MEDIA PARTNERS

COMES NOW, Time Warner AxS of Florida, L.P. and Digital Media Partners (collectively "Time Warner"), and pursuant to Rule 25-22.038, Florida Administrative Code, and the Order Establishing Procedure, respectfully submits its Prehearing Statement in the above-captioned docket to the Florida Public Service Commission ("Commission" or "FPSC").

A. WITNESSES, TESTIMONY AND ISSUES

Direct Testimony:

Witness Joan McGrath Issues 1, 2

Rebuttal Testimony:

Witness Joan McGrath Issues 1-10

B. EXHIBITS

Direct Testimony:

JM-1 Resume

C. STATEMENT OF BASIC POSITION

The best method of interconnection compensation, especially in a infant local exchange market, is a bill and keep arrangement. This is the method that local exchange companies (LECs) use today for local interconnection with one another. Bill and keep is administratively simple, and allows competitors to choose a network

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architecture which is most efficient. In addition, bill and keep is most likely to produce the benefits of competition for consumers. In technical interconnection arrangements, Teleport Communications Group, Inc. [the alternative local exchange company (ALEC)] should be treated as a co-carrier, utilizing many of the mechanisms that are in place between LECs today. Finally, although some witnesses have addressed generic issues, the discussions in this case should be limited to those designated at the September 22 staff workshop.

D-G. ISSUES AND POSITIONS

ISSUE 1: What is (are) the appropriate interconnection rate structure, rate or other arrangements for the exchange of local and toll traffic between Teleport and Southern Bell?

TIME WARNER'S POSITION: The appropriate interconnection arrangement is bill and keep.

ISSUE 2: Should Southern Bell tariff the interconnection rate(s) or other arrangements?

TIME WARNER'S POSITION: Yes.

ISSUE 3: What are the appropriate technical and financial arrangements which should govern interconnection between TCG and BellSouth for the delivery of calls originated and/or terminated from carriers not directly connected to TCG's network?

TIME WARNER'S POSITION: For intraLATA calls (both local and toll), the ALEC should be able to transmit traffic through the

BellSouth tandems to other local service provider end offices that also subtend the BellSouth tandems. On local calls, bill and keep should apply.

On intraLATA toll calls, the intraLATA Modified Access Based Compensation (MABC) plan used between LECs in Florida today should apply. With MABC, the originating company bills its end user for the toll call, and pays the terminating company switched access charges. Where one LEC serves as an intermediary, the intermediary LEC is paid tandem switching and transport as well.

On interLATA toll calls, IXC traffic exchanged between the BellSouth tandem and the ALEC should be handled using industry Meet Point Billing procedures.

ISSUE 4: What are the appropriate technical and financial requirements for the exchange of intraLATA 800 traffic which originates from a TCG customer and terminated to an 800 number served by BellSouth?

TIME WARNER'S POSITION: The company originating the 800 call should send the originating call record to the 800 number owner in order for them to bill the end user. 800 calls originating from the ALEC would be routed to its signal control point (SCP) where a query is launched to the service switching point (SSP). A bill record should be generated by the SSP provider which will be sent to the 800 number owner, so it can bill the 800 end user customer. The ALEC should bill BellSouth originating switched access charges

and an 800 query charge. Depending on the contractual arrangement, there may also be a charge for record provisioning.

ISSUE 5:

(a) What are the appropriate technical arrangements for the interconnection of TCG's network to BellSouth's 911 provisioning network such that TCG's customers are ensured the same level of 911 service as they would receive as a customer of BellSouth?

TIME WARNER'S POSITION: An ALEC's customers must have the same level of access to reliable 911 service as the LEC provides. Achieving the high level of 911 service should be a synergistic effort between the local 911 coordinator, the incumbent 911 tandem provider(s), and the ALECs. The incumbent tandem provider should designate a single point of contact for coordination of installing, testing, and ongoing 911 and E911 operations. All parties should work together toward deploying redundant, reliable, standard facilities. ALECs should be able to utilize the same type facilities as are in place from other end offices in an effort to maintain standardization. Alternate routing and overflow situations should also be a synergistic effort between the ALEC and the incumbent tandem provider delivering the high level of 911 access desired.

(b) What procedures should be in place for the timely exchange and updating of TCG customer information for inclusion in appropriate E911 databases?

TIME WARNER'S POSITION: BellSouth should have the same standards for TCG as it does for itself. The ALEC should use the existing method in place today for transfer and update of correctly formatted E911 datafiles according to an agreed-upon protocol and predetermined schedule.

ISSUE 6: **What are the appropriate technical requirements for operator traffic flowing between TCG's operator services provider and BellSouth's operator services provider including busy line verification and emergency interrupt services?**

TIME WARNER'S POSITION: There are three scenarios for an ALEC to provide Operator Services. The ALEC could self-provide, hire a third party vendor, or hire BellSouth. In either the first or second scenarios, the only connection to BellSouth from the ALEC would be an inward trunk from the ALEC local switch to the BellSouth Operator Services switch so an ALEC operator could contact a BellSouth operator when a local ALEC customer requires busy line verify/interrupt of a BellSouth line. Conversely, if a BellSouth subscriber has a need for verify/interrupt of an ALEC line, an inward trunk arrangement needs to be made available to the ALEC operator provider. The ALEC's operator service provider should be able to verify/interrupt ALEC lines without connecting to BellSouth. If the ALEC selects BellSouth as the provider, operator

services trunking would be required between the ALEC local switch and the BellSouth operator switch to perform all operator services functions.

ISSUE 7: Under what terms and conditions should BellSouth be required to list TCG's customers in its directory assistance database?

TIME WARNER'S POSITION: Both parties, the ALEC and BellSouth, benefit from a combined listing in the BellSouth database. BellSouth maintains a comprehensive, accurate database for its subscribers, as well as all consumers, and the ALEC is able to make its listings universally available as well. Although BellSouth incurs costs for entering and maintaining the ALEC data for Directory Assistance (DA) purposes, BellSouth receives revenues for use of that database. In addition, there is value for all consumers in having a universal database. BellSouth should be required to carry the ALEC listings in its DA database at no charge to the ALEC for these reasons.

ISSUE 8: Under what terms and conditions should BellSouth be required to list TCG's customers in its universal white and yellow pages directories and to publish and distribute these directories to TCG's customers?

TIME WARNER'S POSITION: The consumer advantages of a unified white pages directory cannot be overstated. Because of the small size of new entrants, the benefits for consumers of one directory,

and the absence of efficiencies in separate directories, BellSouth should be required to provide certain listing services to all end users regardless of their local telephone service provider. BellSouth should provide a single line white page listing for the ALEC's customers at no charge to either the ALEC or the end user. For business customers, BellSouth should also provide a single line yellow page listing at no charge as well. BellSouth should be required to ensure accuracy and timeliness in these listings. BellSouth should provide a user guide/informational insert to be published in both the white pages information section and the yellow pages sections, at no charge to the ALEC or its end users. BellSouth should deliver directories to all customers at no charge to the ALEC or its end users. BellSouth will benefit by having more names to sell to its yellow pages affiliate, and BellSouth will have the opportunity to sell yellow page ads to the ALEC's customers.

ISSUE 9: What arrangements are necessary to ensure that TCG can bill and clear credit card, collect, third party calls and audiotext calls?

TIME WARNER'S POSITION: If the LEC has a billing and collection arrangement with an IXC to bill end user toll traffic on the local telephone bill and the new entrant also has billing and collection contracts with that IXC, then the LEC who receives the call detail from the IXC when a ported number is involved should be required to "clear" that traffic to the ALEC, which will

bill the end user. The cost for this should be shared among BellSouth, the ALEC, and the IXC, as part of number portability.

ISSUE 10: What arrangements are necessary to ensure the provision of CLASS/LASS services between TCG's and Southern Bell's networks?

TIME WARNER'S POSITION: The ALEC's point codes (end office addresses) need to be translated in all BellSouth end offices that support CLASS features. Likewise, the point codes of BellSouth end offices need to be translated in the ALEC's switch. In addition, both signal transfer point (STP) pairs (the ALEC's and BellSouth's) must be translated to allow an exchange of messages between end offices. Finally, BellSouth should offer unbundled elements of its signal control point (SCP) for use by ALECs.

H. STIPULATIONS

None

I. PENDING MOTIONS

Time Warner has a Petition to Intervene pending in this Docket.

J. COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE

Time Warner is aware of no requirements with which it cannot comply.

RESPECTFULLY SUBMITTED this 29th day of September, 1995.



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