

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Resolution of Petition(s) to establish )  
non-discriminatory 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

FILED: October 6, 1995

**ORIGINAL  
FILE COPY**

**CONTINENTAL CABLEVISION, INC.'S PREHEARING STATEMENT**

Continental Cablevision, Inc., on behalf of its affiliates, Continental Fiber Technologies, Inc., d/b/a AlterNet, and Continental Florida Telecommunications, Inc. (collectively "Continental") pursuant to Order No. PSC-95-1084-PCO-TP and Rule 25-22.038(3), Florida Administrative Code, respectfully submits the following Prehearing Statement in the above-captioned docket.<sup>1</sup>

**A. WITNESSES**

Continental will present as its witness, A. R. (Dick) Schleiden. His testimony will address Issues Nos. 1 and 2.

Continental reserves the right to call additional witnesses, if necessary, as may be required by later filed testimony, the completion of discovery, or new issues identified at the prehearing conference.

**B. EXHIBITS**

Continental intends to present the following exhibit:

- 1. Exhibit No. \_\_\_\_ (ARS-1) Clemons' Letter of August 17, 1995.

Continental reserves the right to later identify and sponsor such exhibits as may be required by late filed testimony, the completion of discovery, or new issues identified at the prehearing conference.

<sup>1</sup>This prehearing statement is the subject of an accompanying Motion for Leave to File Prehearing Statement Out of Time herein filed contemporaneously.

DOCUMENT NUMBER-DATE

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### **C. BASIC POSITION**

The appropriate compensation arrangement between Teleport or Continental and BellSouth is a bill and keep arrangement. This is the model used for terminating traffic between BellSouth and the facilities-based Independent LECs in Florida today. BellSouth's proposal, based upon the switched access charge model, will stifle full competition and is discriminatory as applied to an ALEC. No issues other than those interconnection issues raised in Teleport's petition and dispute with BellSouth should be addressed at this time.

### **D. ISSUES AND POSITIONS**

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

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

**POSITION:**    The appropriate local interconnection arrangement is a bill and keep arrangement. This arrangement will prevent unreasonable discrimination between local exchange service providers as required by Section 364.16(3), Florida Statutes. Moreover, it is the only solution that will promote consumer choice among the widest possible array of telecommunications services.

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

**POSITION:**    Yes.

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

**POSITION:** BellSouth should provide intermediary tandem switching and transport to connect an ALEC's (i.e. Teleport's or Continental's) end user to the end user of another ALEC, a LEC other than BellSouth, interexchange carrier(s) or wireless telecommunications service providers, for the purpose of making local and toll calls.

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

**POSITION:** BellSouth should compensate an ALEC (i.e. Teleport or Continental) for the origination of 800 traffic terminated to BellSouth pursuant to the ALEC's originating switched access charges. The ALEC will provide to BellSouth the appropriate records necessary for BellSouth to bill its customers. At such time as the ALEC elects to provide 800 services, BellSouth should reciprocate this arrangement.

**ISSUE 5:** (a) What are the appropriate technical arrangements for the interconnection of TCG's or Continental's network to BellSouth's 911 provisioning network such that TCG's and Continental's customers are ensured the same level of 911 service as they would receive as a customer of BellSouth?

**POSITION:** An ALEC's customers must have the same level of access to reliable 911 service as the LEC providers. For basic 911 service, BellSouth should provide a list consisting of each municipality in Florida that subscribes to Basic 911 service. The list will also provide the E911 conversion date and, for network routing purposes, a ten-digit directory number representing the appropriate emergency answering position for each municipality subscribing to Basic 911 service. Each ALEC should arrange to accept 911 calls from its customers in municipalities that subscribe to Basic 911 service and translate the 911 call to the appropriate 10-digit directory number as stated on the list provided by BellSouth and route that call to BellSouth at the appropriate tandem or end office. When a municipality converts to E911 service, the ALEC should be required to discontinue the Basic 911 procedures and begin the E911 procedures.

For E911 service, the ALEC should connect Feature Group D trunks to the appropriate E911 tandem, including the designated secondary tandem. If a municipality has converted to E911 service, the ALEC should forward 911 calls to the appropriate E911 primary tandem, along with ANI, based upon the current E911 end office to tandem homing arrangement as provided by BellSouth. If the primary tandem trunks are not available, the ALEC should alternate route the call to the designated secondary E911 tandem. If the secondary tandem trunks are not available, the ALEC should alternate route the call to the appropriate Traffic Operator Position System (TOPS) tandem.

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

**POSITION:** In order to ensure the proper working of the system along with accurate customer data, the ALEC should provide daily updates to the E911 database. BellSouth must be required to work cooperatively with the ALEC to define record layouts, media requirements, and procedures for this process.

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

**POSITION:** BellSouth and an ALEC (i.e. Teleport or Continental) should mutually provide each other busy line verification and emergency interrupt services. BellSouth's services should be tariffed.

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

**POSITION:** BellSouth should include an ALEC's (i.e. Teleport's and Continental's) customers' primary listings (residence and business listings) and yellow page (business) listings in its directory assistance database at no charge.

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

**POSITION:** BellSouth should include an ALEC's (i.e. Teleport's and Continental's) customers' primary listings in the white page and yellow page directories, distribute directories to the customers of each and recycle all customers' directory books at no charge. BellSouth and the ALEC should work cooperatively on issues concerning lead time, timeliness, format, and content of list information.

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

**POSITION:** Continental adopts Teleport's position on this issue for purposes of the resolution of the interconnection dispute between Teleport or Continental and BellSouth.

**ISSUE 10:** **What arrangements are necessary to ensure the provision of CLASS/LASS services between Teleport or Continental and BellSouth?**

**POSITION:** BellSouth and the ALEC (i.e. Teleport or Continental) should provide LEC-to-LEC Common Channel Signalling (CCS) to one another, where available, in conjunction with all traffic in order to enable full interoperability of CLASS features and functions. All CCS signalling parameters should be provided including Automatic Number Identification (ANI), Originating Line Information (OLI) calling party category, charge number, etc. All privacy indicators should be honored. BellSouth and the ALEC should cooperate on the exchange of Transactional Capabilities Application Point (TCAP) messages to facilitate full interoperability of CCS-based features between their networks. CCS should be provided Signal Transfer Point to Signal Transfer Point.

**E. STIPULATIONS**

Continental is not aware of any matters that have been stipulated at this time.

**F. PENDING MOTIONS**

Continental has a Motion for Leave to File Prehearing Statement Out of Time that is pending at this time.

**G. OTHER REQUIREMENTS**

There are no requirements of the procedural order that Continental is unable to comply with.

**RESPECTFULLY SUBMITTED** this 6th day of October, 1995.

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**CERTIFICATE OF SERVICE**  
**DOCKET NO 950985-TP**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by Hand Delivery(\*) and/or Overnight Mail on this 6th day of October, 1995 to the following parties of record:

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