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# PENNINGTON & HABEN

A PROFESSIONAL ASSOCIATION

ATTORNEYS AT LAW

BARBARA D. AUGER  
WILLIAM W. BLUE  
D. ANDREW BYRNE †  
BRAM D. E. CANTER  
ROBERT CINTRON, JR.  
ROBERT S. COHEN  
CHARLES L. COOPER, JR.  
BRUCE CULPEPPER  
SONYA KROUSKOP DAWS  
PETER M. DUNBAR  
DAVISSON F. DUNLAP, JR.  
JOHN FRENCH  
RALPH H. HABEN, JR.  
SHARON N. JACOBS  
MICHAEL A. KLINER  
DANIEL E. MANAUSA

DAVID K. MINACCI  
CHARLES W. MURPHY  
JOHN C. PELHAM  
CARL R. PENNINGTON, JR., P.A.  
RONALD R. RICHMOND  
C. EDWIN RUDE, JR.  
DARREN A. SCHWARTZ  
NANCY BLACK STEWART  
CYNTHIA S. TUNNICLIFF  
WILLIAM E. WHITNEY  
BEN H. WILKINSON  
CATHI C. WILKINSON  
† Also Admitted in Tennessee

OF COUNSEL  
R. STUART HUFF, P.A.  
Coral Gables, Florida  
CHRISTOPHER W. KANAGA  
(Admitted in Massachusetts & Colorado Only)  
SCOTT MADDOX  
WILLIAM VANDERCREEK  
(Admitted in Texas & Iowa Only)  
SPECIAL CONSULTANTS  
JOHN F. BLACK, III\*  
RANDY MILLER\*  
DAVID L. SWAFFORD\*  
\*Not A Member Of The Florida Bar

215 SOUTH MONROE STREET  
2ND FLOOR  
TALLAHASSEE, FLORIDA 32301

(904) 222-3533  
FAX (904) 222-2126  
E-Mail Phlaw@Supernet.net

1002 WEST 23RD STREET, SUITE 350  
PANAMA CITY, FLORIDA 32405  
(904) 769-7864

REPLY TO:  
P.O. BOX 10095  
TALLAHASSEE, FL 32302-2095

November 20, 1995

ORIGINAL  
FILE COPY  
via Hand Delivery

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

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:

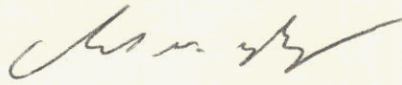
Enclosed for filing please find an original and fifteen copies  
of Digital Media Partners' Petition to Establish Nondiscriminatory  
Rates, Terms and Conditions for Interconnection between Time Warner  
and BellSouth and the Direct Testimony of Joan McGrath for the  
above-referenced docket.

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.

  
Charles W. Murphy

- K
- A
- P
- F
- DI  Chase
- TR
- AG
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- EC  1
- VAS

RECEIVED & FILED  
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BUREAU OF RECORDS  
CWM/tmz  
Enclosures

cc: All Parties of Record (w/ enclosure)

Testimony  
DOCUMENT NUMBER-DATE  
11640 NOV 20 95

Petition  
DOCUMENT NUMBER-DATE  
11640 NOV 20 95

FPSC-RECORDS/REPORTING

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Resolution of Petition(s) ) Docket No. 950985-TP  
to Establish Nondiscriminatory )  
Rates, Terms, and Conditions for ) Filed: November 20, 1995  
Interconnection Involving Local )  
Exchange Companies and Alternative )  
Local Exchange Companies Pursuant )  
to Section 364.162, Florida Statutes )  
\_\_\_\_\_ )

DIGITAL MEDIA PARTNERS' PETITION TO ESTABLISH  
NONDISCRIMINATORY RATES, TERMS, AND CONDITIONS FOR  
INTERCONNECTION BETWEEN DIGITAL MEDIA PARTNERS AND BELLSOUTH  
AND THE DIRECT TESTIMONY OF JOAN MCGRATH

COMES NOW, Digital Media Partners ("DMP" or "Petitioner"), pursuant to Rule 25-22.036, F.A.C., Section 364.162, Florida Statutes, and the Order Establishing Procedure and files its Petition to Establish Nondiscriminatory Rates, Terms, and Conditions for Interconnection between DMP and BellSouth and its Direct Testimony of Joan McGrath. In support thereof, DMP states the following:

A. The names and addresses of the persons to whom copies of all correspondence, notices, orders and other documents in this proceeding should be sent are as follows:

Peter M. Dunbar, Esq.  
Charles W. Murphy, Esq.  
Pennington & Haben, P.A.  
Post Office Box 10095  
Tallahassee, FL 32302  
(904) 222-3533  
(904) 222-2126 (facsimile)

Ms. Jill Butler  
Florida Regulatory Director  
Time Warner Communications  
2773 Red Maple Ridge  
Tallahassee, FL 32301  
(904) 942-0431  
(904) 942-1181 (facsimile)

Sue E. Weiske, Senior Counsel  
Law Department  
Time Warner Communications  
160 Inverness Drive West  
Englewood, Colorado 80112  
(303) 799-5513 (voice mail)  
(303) 799-5591 (facsimile)

DOCUMENT NUMBER-DATE

11640 NOV 20 95

FPSC-RECORDS/REPORTING 346

B. The address for DMP is 1 Prestige Place, Suite 255, 2600 McCormack Drive, Clearwater, Florida 34619-1098.

C. DMP filed a notice of intent to provide alternative local exchange telecommunications services with the Commission on August 1, 1995. DMP is the holder of Alternative Local Exchange Certificate No. 3135 and is authorized to provide ALEC services beginning January 1, 1996.

D. DMP requires an agreement establishing acceptable rates, terms, and conditions for interconnection with the BellSouth network before DMP can enter the local exchange market.

E. After extensive preliminary discussions between the parties, negotiations between DMP and BellSouth began on August 9, 1995, at a meeting held in Atlanta Georgia.

F. Pursuant to Section 364.162, Florida Statutes, if interconnection negotiations are unsuccessful, after 60 days either party may petition the Commission to establish nondiscriminatory rates, terms, and conditions.

G. To date, DMP and BellSouth have been unable to reach a comprehensive written agreement establishing the rates, terms, and conditions for interconnection of the BellSouth and DMP networks.

H. While there does not appear to be disagreement on every aspect of interconnection, absent a written agreement between DMP and BellSouth, DMP believes that the Commission must resolve the following issues:

1. What are the appropriate rate structures, interconnection rates, or other compensation arrangements for the exchange of local and toll traffic between DMP and Southern Bell?
2. If the Commission sets rates, terms, and conditions for interconnection between DMP and Southern Bell, should Southern Bell tariff the interconnection rate(s) or other arrangements?
3. What are the appropriate technical and financial arrangements which should govern interconnection between DMP and Southern Bell for the delivery of calls originated and/or terminated from carriers not directly connected to the DMP network?
4. What are the appropriate technical and financial requirements for the exchange of intraLATA 800 traffic which originates from DMP's customer and terminates to an 800 number served by or through Southern Bell?
- 5a. What are the appropriate technical arrangements for the interconnection of DMP's network to Southern Bell's 911 provisioning network such that DMP's customers are ensured the same level of 911 service as they would receive as a customer of Southern Bell?


- 5b. What procedures should be in place for the timely exchange and updating of DMP's customer information for inclusion in appropriate E911 databases?
6. What are the appropriate technical and financial requirements for operator handled traffic flowing between DMP and Southern Bell including busy line verification and emergency interrupt services?
7. What are the appropriate arrangements for the provision of directory assistance services and data between DMP and Southern Bell?
8. Under what terms and conditions should Southern Bell be required to list DMP's customers in its white and yellow pages directories and to publish and distribute these directories to DMP's customers?
9. What are the appropriate arrangements for the provision of billing and collection services between DMP and Southern Bell, including billing and clearing credit card, collect, third party and audiotext calls?
10. What arrangements are necessary to ensure the provision of CLASS/LASS services between DMP's and Southern Bell's networks?
11. What are the appropriate arrangements for physical interconnection between DMP and Southern Bell, including trunking and signalling arrangements?

12. To the extent not addressed in the number portability docket, Docket No. 950737-TP, what are the appropriate financial and operational arrangements for interexchange calls terminated to a number that has been "ported" to DMP.
13. What arrangements, if any, are necessary to address other operational issues?
14. What arrangements, if any, are appropriate for the assignment of NXX codes to DMP?

I. DMP's positions regarding the foregoing issues are set forth more fully in the direct testimony of Joan McGrath which is attached to this petition.

**WHEREFORE** Digital Media Partners respectfully requests the Florida Public Service Commission to set nondiscriminatory rates, terms, and conditions for interconnection of the DMP and BellSouth networks.

**RESPECTFULLY SUBMITTED** this 20th day of November, 1995.

  
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**PETER M. DUNBAR, ESQ.**  
Fla. Bar No. 146594  
**CHARLES W. MURPHY, ESQ.**  
Fla. Bar No. 853712  
Pennington & Haben, P.A.  
Post Office Box 10095 (32302-2095)  
215 S. Monroe Street, 2nd Floor  
Tallahassee, Florida 32301  
(904) 222-3533  
(904) 222-2126 (facsimile)

Counsel for: Digital Media Partners

CERTIFICATE OF SERVICE  
DOCKET NO. 950985-TP

I HEREBY CERTIFY that a true and correct copy of Digital Media Partners' Petition to Establish Nondiscriminatory Rates, Terms, and Conditions for Interconnection between Digital Media Partners' and BellSouth and the Direct Testimony of Joan McGrath has been served by either \*Federal Express or Hand Delivery on this 20th day of November, 1995, to the following parties of record:

Ms. Jill Butler  
Florida Regulatory Director  
Time Warner Communications  
2773 Red Maple Ridge  
Tallahassee, FL 32301

\*Jodie Donovan-May, Esq.  
Eastern Region Counsel  
Teleport Communications  
Group, Inc.  
2 Lafayette Center  
1133 21st Street, N.W.  
Suite 400  
Washington, D.C. 20036

Kenneth A. Hoffman, Esq.  
Rutledge, Ecenia, Underwood,  
Purnell & Hoffman  
215 South Monroe Street  
Suite 420  
Tallahassee, FL 32301-1841

J. Phillip Carver, Esq.  
c/o Nancy H. Sims  
Southern Bell Telephone  
& Telegraph Company  
150 S. Monroe Street, Suite 400  
Tallahassee, FL 32301

Bob Elias, Staff Counsel  
Florida Public Service Comm.  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Anthony P. Gillman  
Kimberly Caswell  
GTE Florida Incorporated  
c/o Richard M. Fletcher  
106 East College Avenue  
Suite 1440  
Tallahassee, FL 32301

Michael W. Tye, Esq.  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301

Everett Boyd  
Ervin, Varn, Jacobs,  
Odom & Ervin  
305 S. Gadsden Street  
Tallahassee, FL 32301

Laura L. Wilson, Esq.  
Charles F. Dudley, Esq.  
Florida Cable Telecommunications  
Association, Inc.  
310 N. Monroe Street  
Tallahassee, FL 32301

Richard Melson  
Hopping, Green, Sams & Smith  
123 S. Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32301

Angela B. Green, Esq.  
Florida Public Telecommunications  
Association, Inc.  
125 S. Gasden Street  
Suite 200  
Tallahassee, FL 32301

\*Michael J. Henry  
MCI Telecommunications Corp.  
780 Johnson Ferry Rd., Suite 700  
Atlanta, GA 30342

Floyd R. Self, Esq.  
Messer, Vickers, Caparello,  
Madsen, Goldman & Metz, P.A.  
Post Office Box 1876  
215 South Monroe Street  
Suite 701  
Tallahassee, FL 33401

\*Timothy Devine  
MFS Communications Company, Inc.  
250 Williams Street, Suite 2200  
Atlanta, GA 30303-1034  
(Metropolitan Fiber Systems)

\*Richard M. Rindler  
James C. Falvey  
Swidler & Berlin, Chartered  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007

William H. Higgins, Esq.  
AT&T Wireless Services  
Suite 900  
250 S. Australian Avenue  
West Palm Beach, FL 33401

Patrick K. Wiggins  
Marsha E. Rule  
Wiggins & Villacorta, P.A.  
501 E. Tennessee Street  
Suite B  
Post Office Box 1657  
Tallahassee, FL 32302

Robin D. Dunson, Esq.  
1200 Peachtree St., NE  
Promenade I, Room 4038  
Atlanta, GA 30309

Donald L. Crosby  
Regulatory Counsel  
Continental Cablevision, Inc.  
Southeastern Region  
7800 Belfort Parkway, Suite 270  
Jacksonville, FL 32256-6925  
(904) 731-8810  
(904) 281-0342 (fax)

A.R. "Dick" Schleiden  
General Manager  
Continental Fiber Technologies,  
Inc. d/b/a AlterNet  
4455 Baymeadows Road  
Jacksonville, FL 32217  
(904) 448-3390  
(904) 731-8699 (fax)



Bill Wiginton  
Hyperion Telecommunications, Inc.  
Boyce Plaza III  
2570 Boyce Plaza Road  
Pittsburgh, Pennsylvania 15241  
(412) 221-1888  
(412) 221-6642 (fax)

Sue E. Weiske, Senior Counsel  
Law Department  
Time Warner Communications  
160 Inverness Drive West  
Englewood, Colorado 80112  
(303) 799-5513 (voice mail)  
(303) 799-5591 (facsimile)

  
\_\_\_\_\_  
CHARLES W. MURPHY, ESQ.