

446
m



Michael W. Tye
Sr. Attorney

Suite 700
101 N. Monroe Street
Tallahassee, FL 32301
904 425-6360
FAX: 904 425-6361

December 11, 1995

ORIGINAL
FILE COPY

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

Re: Docket No. 950984-TP

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket
are an original and fifteen (15) copies of AT&T's
Prehearing Statement.

ACK Copies of the foregoing are being served on all parties
of record in accordance with the attached Certificate of
AFA _____ Service.
APP _____

CAF _____

CMU Chase

CTR _____

EAC _____

LEG 1

LPI 5

OPD _____

Attachments

ROC _____

cc: J. P. Spooner, Jr.

SEC 1

Parties of Record

WAS _____

OTH _____

Yours truly,

Michael W. Tye

RECEIVED & FILED
LC/20
FPSC JOURNAL OF RECORDS

DOCUMENT NUMBER-DATE

12365 DEC 11 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

In re: Resolution of Petition(s))
to establish nondiscriminatory)
rates, terms, and conditions for)
resale involving local exchange)
companies and alternative local)
exchange companies pursuant to)
Section 364.161, Florida Statutes.)
_____)

DOCKET NO. 950984-TP

FILED: 12/11/95

AT&T'S PREHEARING STATEMENT

AT&T Communications of the Southern States, Inc.
(hereinafter "AT&T"), pursuant to Rule 25-22.038, Florida
Administrative Code, and order of the Florida Public Service
Commission (hereinafter the "Commission") hereby submits its
Prehearing Statement in the above-referenced docket.

A. Witnesses

AT&T intends to sponsor the testimony of the following
witnesses:

1. Mike Guedel: Mr. Guedel's direct testimony
responds to Issues 1 through 4. His testimony
describes, in a generic sense, the concept of
unbundling and its role in interconnection
arrangements. His testimony further demonstrates why
it is necessary for the incumbent LECs to unbundle
their local networks and recommends specific guidelines
for the technical arrangement and pricing of the local
unbundled network elements.

DOCUMENT NUMBER-DATE

12365 DEC 11 95

FPSC-RECORDS/REPORTING

2. Joseph Gillan: Mr. Gillan will present rebuttal testimony which responds to the direct testimonies of BellSouth's witnesses Scheye and Bannerjee. His testimony specifically responds to the BellSouth's suggestion that anything less than full availability of the BellSouth network to its local competitors at cost-based rates will provide Florida consumers with a choice of local service providers.

AT&T further reserves the right to call any additional witnesses and present any additional evidence that might be necessary to respond to matters which are raised for the first time at the hearings in this docket.

B. Exhibits.

AT&T has not prefiled any exhibits in this case. However, AT&T reserves the right to present any exhibits that may be necessary to cross-examine opposing witnesses or to respond to matters which are raised for the first time at the hearings in this proceeding.

C. Basic Position.

AT&T submits that attempts to promote the development of local exchange competition serve the public interest, but it must be recognized that the general availability of facilities-based competition, while desirable, is not likely to develop in the near term. Therefore, to encourage the development of potential local competition, and to encourage

the breadth of competitive availability, the Commission must order BellSouth to unbundle its services into underlying Basic Network Functions (hereinafter "BNFs".) The unbundled BNFs should be offered to new entrants under the same basic arrangements and with the same technical capabilities as they are used by BellSouth in the provision of its services. To further encourage the potential development of competition, the unbundled elements should be priced at the Total Service Long Run Incremental Cost (hereinafter "TSLRIC") incurred by BellSouth in providing each element.

D. Fact Issues.

See Attachment 1 (AT&T's Positions on Issues).

E. Legal Issues.

See Attachment 1 (AT&T's Positions on Issues).

F. Policy Issues.

See Attachment 1 (AT&T's Positions on Issues).

G. Position on Issues.

See Attachment 1 (AT&T's Positions on Issues).

H. Stipulated Issues.

AT&T is not aware of any issues that have been stipulated to by the parties.

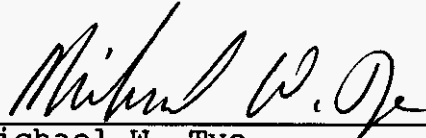
I. Pending Motions.

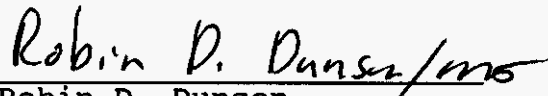
AT&T is not aware of any pending motions.

J. Other Requirements.

AT&T is not aware of any requirements set forth in the Order on Prehearing Procedure with which it is unable to comply.

Respectfully submitted this 11th day of December, 1995.


Michael W. Tye
101 N. Monroe St.
Suite 700
Tallahassee, FL 32301
(904) 425-6360


Robin D. Dunson
1200 Peachtree St., NE
Promenade I, Room 4038
Atlanta, Georgia 30309
(404) 810-8689

ATTORNEYS FOR AT&T
COMMUNICATIONS OF THE
SOUTHERN STATES, INC.

AT&T'S POSITIONS ON ISSUES

ISSUE 1: What elements should be made available by BellSouth to MFS and MCImetro on an unbundled basis (e.g., loop elements, port elements, loop concentration, and loop transport)?

AT&T'S POSITION: BellSouth should be required to unbundle local loops and local switching ports.

The local loop functions to connect an end user premises to the service wire center of the local exchange company. The traditional local loop facility can be divided onto three sub-elements: loop distribution, loop multiplexing and concentration, and loop feeder.

The local switch functions to create on demand temporary paths connecting local loops to other local loops or local loops to interoffice transport facilities. Typical switching functions include: 1) recognizing service requests, 2) obtaining call specific information, 3) data analysis, 4) route selection, 5) call completion, 6) testing and recording, etc. Further local switching BNFs must include access to unbundled Advanced Intelligent Network (AIN) triggers. These triggers will offer a new entrant certain call control capability within the LEC switch allowing it to customize its end user offerings without having to duplicate the LEC switch.

AT&T WITNESSES: Mike Guedel
Joseph Gillan

ISSUE 2: What are the appropriate technical arrangements for the provision of such unbundled elements?

AT&T'S POSITION: The overarching guideline should be to provide the unbundled elements in such a manner as to not inhibit the new entrant from providing the same quality of service as the incumbent LEC. That means that the technical arrangements used to connect the

unbundled element(s) to a new entrant's network should be equal to those currently used to connect the element(s) within the LEC's own network. New entrants should have cooperatively engineered interconnection arrangements, equal service quality or performance parity, and the opportunity to interconnect at the same points or virtually the same points where practicable as the incumbent LEC.

AT&T WITNESSES: Mike Guedel
Joseph Gillan

ISSUE 3: What are the appropriate financial arrangements for each such unbundled element?

AT&T'S POSITION: The target price for the unbundled elements should be the Total Service Long Run Incremental Cost (TSLRIC) that the LEC incurs in providing them. Pricing at TSLRIC will simultaneously ensure that the incumbent LEC recovers all of the costs that it incurs in providing the unbundled element(s) (including cost of money), while it encourages the potential development of competition by offering the unbundled element(s) (at least from a price perspective) in a competitively neutral manner.

AT&T WITNESSES: Mike Guedel
Joseph Gillan

ISSUE 4: What arrangements, if any, are necessary to address other operational issues?

AT&T'S POSITION: AT&T takes no position on this issue at this time.

CERTIFICATE OF SERVICE

DOCKET NO. 950984-TP

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand-delivery to the following parties of record this 11th day of December, 1995:

Charles Beck, Esq.
Office of Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Donna Canzano, Esq.
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0863

C. Everett Boyd, Jr., Esq.
Ervin Varn Jacobs & Odom
Post Office Drawer 1170
Tallahassee, FL 32302

Floyd Self, Esq.
Messer Vickers et al
215 S. Monroe St., Ste. 701
Tallahassee, FL 32301

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

Richard D. Melson, Esq.
Hopping Green Sams & Smith
123 South Calhoun Street
Tallahassee, FL 32301

Kenneth Hoffman, Esq.
Rutledge Ecenia et al
215 S. Monroe St., Ste. 420
Tallahassee, FL 32301

Peter Dunbar, Esq.
Pennington Law Firm
215 S. Monroe St., Ste 200
Tallahassee, FL 32301

James Falvey, Esq.
Swidler & Berlin
3000 K St., NW, Ste. 300
Washington, DC 20007

Laura Wilson, Esq.
FL Cable Telecommunications
310 N. Monroe Street
Tallahassee, FL 32301

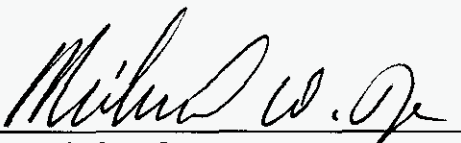
Lee Willis, Esq.
Jeffry Wahlen, Esq.
Macfarlane Ausley et al
228 S. Calhoun Street
Tallahassee, FL 32301

Anthony P. Gillman, Esq.
Kimberly Caswell, Esq.
GTE Florida, Incorporated
201 N. Franklin Street
Tampa, FL 33601

Nancy H. Sims
Southern Bell Telephone
150 S. Monroe St., Ste. 400
Tallahassee, FL 32301

David B. Erwin, Esq.
Young, VanAssenderp, Varnadoe
225 S. Adams St., Ste 200
Tallahassee, FL 32301

Lynn B. Hall
Vista-United Telecommunications
3100 Bonnett Creek Parkway
Lake Buena Vista, FL 32830


Michael W. Tye