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Florida Cable Telecommunications Association

Steve Wilkerson, President

December 11, 1995

ORIGINAL FILE

VIA HAND DELIVERY

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

RE: DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP, 950985C-TP, 950985D-TP

Dear Ms. Bayo:

Enclosed for filing in the above-captioned docket are an original and fifteen copies of Florida Cable Telecommunications Association, Inc.'s ("FCTA") Prehearing Statement. Copies have been served on the parties of record pursuant to the attached certificate of service.

Also enclosed is a copy on a 3-1/2" diskette in WordPerfect format, version 5.1.

Please acknowledge receipt and filing of the above by date stamping the duplicate copy of this letter and returning the same to me.

OK  Thank you for your assistance in processing this filing.

FA   
JFF  Yours very truly,

SAF   
AND

CTR  Laura L. Wilson  
WAS  Vice President, Regulatory Affairs  
JFG  & Regulatory Counsel

EW  Enclosures

CC: Mr. Steven E. Wilkerson  
All Parties of Record

SEC   
WAS

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: 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 )  
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DOCKET NOS. 950985-TP  
950985A-TP  
950985B-TP  
950985C-TP  
950985D-TP

Filed: December 11, 1995

**FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION, INC.'S  
PREHEARING STATEMENT**

The Florida Cable Telecommunications Association, Inc., 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.

**A. WITNESSES**

Jeffrey E. Smith (direct testimony) and John P. Kern (rebuttal testimony) will testify as to the appropriate interconnection and other arrangements between Teleport and BellSouth (Docket No. 950985-TP). The parties have previously agreed to stipulate Mr. Smith's direct testimony into the record. Joseph P. Cresse will present direct and rebuttal testimony on the appropriate interconnection and other arrangements between Continental, Time Warner AxS L.P./Digital Media Partners and BellSouth. (Docket Nos. 950985A-TP and 950985D-TP).

**B. EXHIBITS**

FCTA will sponsor the following exhibits:

Docket No. 950985-TP:

JPK-1          Resume of John P. Kern

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Docket Nos. 950985A-TP/950985D-TP:

JPC-1	Resume of Joseph P. Cresse
JPC-2	Universal Service/Interconnection portions of PCB 95-01(D)
JPC-3	Amendments to PCB 95-01(D)
JPC-4	Transcript of April 12, 1995 House Committee Meeting
JPC-5	State of Washington Order

### **C. BASIC POSITION**

The FCTA urges the adoption of the comprehensive Stipulation and Agreement entered into between FCTA, BellSouth, Continental and Time Warner Axs L.P./Digital Media Partners filed in this docket on December 8, 1995. Part of the comprehensive Stipulation and Agreement addresses the terms of interconnection. The Stipulation and Agreement is in the public interest and will permit the introduction of local competition to Florida's consumers on an expedited basis.

If the Commission does not adopt the comprehensive Stipulation and Agreement in its entirety, the most efficient and administratively simple method of interconnection is bill and keep. This method is currently used today for the exchange of local traffic among incumbent local exchange providers.

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

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

**ISSUE 1: What are the appropriate rate structures, interconnection rates, or other compensation arrangements for the exchange of local and toll traffic between the respective ALECs and Southern Bell?**

**POSITION:**

The FCTA urges the adoption of the entire comprehensive Stipulation and Agreement entered into between FCTA, BellSouth, Continental, Time Warner AxS L.P./Digital Media Partners and filed in these Dockets on December 8, 1995. That agreement, taken as a whole, establishes reasonable local interconnection arrangements between local providers. If that Agreement is not adopted in its entirety, FCTA supports the use of bill and keep for the exchange of local traffic among local providers.

**ISSUE 2: If the Commission sets rates, terms, and conditions for interconnection between the respective ALECs and Southern Bell, should Southern Bell tariff the interconnection rate(s) or other arrangements?**

**POSITION:**

Yes.

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

**POSITION:** BellSouth should provide intermediary tandem switching and transport to connect an ALEC's end user to the end user of another ALEC, a LEC other than BellSouth, interexchange carrier(s), another telecommunications company, or wireless telecommunications

service providers, for the purpose of making local and toll calls. This should occur pursuant to the terms of the December 8, 1995 Stipulation and Agreement.

**ISSUE 4: What are the appropriate technical and financial requirements for the exchange of intraLATA 800 traffic which originates from the respective ALECs' customer and terminates to an 800 number served by or through Southern Bell?**

**POSITION:** BellSouth should compensate an ALEC for the origination of 800 traffic terminated to BellSouth pursuant to the ALEC's originating switched access charges, including the data base query. The ALEC should provide to BellSouth the appropriate records necessary for BellSouth to bill its customers. The records should be provided in a standard ASR/EMR format for a fee of \$0.015 per record. At such time as the ALEC elects to provide 800 services, BellSouth should reciprocate this arrangement. Should BellSouth be permitted to provide interLATA 800 services, BellSouth should be responsible for compensating the ALECs for the origination of such traffic as well on the same terms and conditions.

**ISSUE 5: a. What are the appropriate technical arrangements for the interconnection of the respective ALECs' network to Southern Bell's 911 provisioning network such that the respective ALECs' customers are ensured the same level of 911 service as they would receive as a customer of Southern Bell?**

**POSITION:** An ALEC's customers must have the same level of access to reliable 911 service as the LEC provides. For basic 911 service, BellSouth should provide a list consisting of each municipality in Florida that subscribes to Basic 911 service. The list should 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 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 the respective ALECs 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 work

cooperatively with the ALEC to define record layouts, media requirements, and procedures for this process.

In some instances BellSouth is responsible for maintenance of the E911 data-base and is compensated for performing these functions by either the municipality or the ALEC - for maintaining the ALEC's information, In no event, however, should BellSouth be entitled to compensation from both parties for the same function.

**ISSUE 6: What are the appropriate technical and financial requirements for operator handled traffic flowing between the respective ALECs and Southern Bell including busy line verification and emergency interrupt services?**

**POSITION:** BellSouth and ALECs should mutually provide each other busy line verification and emergency interrupt services. BellSouth's services should be tarified.

**ISSUE 7: What are the appropriate arrangements for the provision of directory assistance services and data between the respective ALECs and Southern Bell?**

**POSITION:** BellSouth should include an ALEC'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 Southern Bell be required to list the respective ALECs' customers in its white and yellow pages directories and to publish and distribute these directories to the respective ALECs' customers?**

**POSITION:** BellSouth should include an ALEC'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 are the appropriate arrangements for the provision of billing and collection services between the respective ALECs and Southern Bell, including billing and clearing credit card, collect, third party and audiotext calls?**

**POSITION:**

FCTA has no position on this issue at this time.

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

**POSITION:** BellSouth and the ALECs should provide LEC-to-LEC Common Channel Signalling to one another, where available, in conjunction with all traffic in order to enable full inter-operability of CLASS features and functions. ALI CCS signalling parameters should be provided including automatic number identification, originating line information calling party category, charge number, etc. ALI privacy indicators must be honored, and BellSouth and the ALECs will cooperate on the exchange of Transactional Capabilities Application Part messages to facilitate full inter-operability of CCS-based features between their respective networks.

**ISSUE 11: What are the appropriate arrangements for physical interconnection between the respective ALECs and Southern Bell, including trunking and signalling arrangements?**

**POSITION:** For network expansion, BellSouth and ALECs should review engineering requirements on a quarterly basis and establish forecasts for trunk utilization. New trunk groups

should be implemented as dictated by engineering requirements for both BellSouth and the ALEC. BellSouth and the ALEC must provide each other the proper call information to enable each company to bill accordingly.

In addition to CLASS inter-operability, BellSouth should offer use of its signalling network on an unbundled basis at tariffed rates. Signalling functionality should be available with both A-link and B-link connectivity.

**ISSUE 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 the respective ALECs.**

**POSITION:** For that terminating traffic ported to the ALEC which requires use of the BellSouth tandem switching BellSouth should bill the IXC tandem switching, the residual interconnection charge, and a portion of the transport, and the ALEC should bill the IXC local switching, the carrier common line, and a portion of the transport. If BellSouth is unable to provide the necessary access records to permit the ALECs to bill the IXCs directly for terminating access to ported numbers, then the parties must be required to work cooperatively to develop a surrogate method to approximate the access minutes and a settlement process with BellSouth to recover those access revenues due it as a co-provider of access service to IXCs. During the interim, while the surrogate is being developed, BellSouth should bill the IXC full terminating switched access charges, keep the residual interconnection charge, tandem switching and a portion of transport, and remit the local switching, a portion of transport and CCL revenues to the ALEC. If a BellSouth intraLATA call is delivered to the ALEC, BellSouth should pay the ALEC terminating access rates.

In the event that the ALEC and the IXCs have direct connection for all traffic except for terminating traffic through remote call forwarding, then all access revenues associated with these calls should be due the ALEC. The company switching a call on a ported number agrees to pass through all terminating intrastate toll switched access revenues associated with those calls to the company to which the number is ported. This includes intraLATA toll calls from a BellSouth customer to a ported BellSouth number that terminated to an ALEC.

**ISSUE 13: What arrangements, if any, are necessary to address other operational issues?**

**POSITION:** FCTA urges the adoption of the other arrangements in the comprehensive Stipulation and Agreement.

**ISSUE 14: What arrangements, if any, are appropriate for the assignment of NXX codes to the respective ALECs?**

**POSITION:** FCTA urges the adoption of the comprehensive Stipulation and Agreement. In addition, BellSouth should sponsor any ALEC that makes a request and assist the ALEC in obtaining RAO codes, and any other billing and accounting codes necessary for the provision of local telephone numbers within BellSouth jurisdiction.

#### **E. STIPULATIONS**

A Stipulation and Agreement was filed on December 8, 1995 between FCTA, Time Warner AxS L.P./Digital Media Partners and BellSouth.

**F. PENDING MOTIONS**

In these dockets, the FCTA, Time Warner AxS, L.P./Digital Media Partners and BellSouth filed on December 8, 1995 a joint Motion to Accept Stipulation and Agreement and for Partial Stay.

**G. OTHER REQUIREMENTS**

FCTA is unaware of any other requirements of the prehearing order with which it cannot comply.

**RESPECTFULLY SUBMITTED** this 11th day of December, 1995.

  
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Laura L. Wilson  
Florida Cable Telecommunications Association, Inc.  
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**CERTIFICATE OF SERVICE**

**DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP, 950985C-TP, 950985D-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing been furnished by Hand Delivery(\*) and/or U.S. Mail on this 11th day of December, 1995 to the following parties of record:

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