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BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

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In re: Resolution of Petition(s) to )  
 establish nondiscriminatory rates, terms )  
 and conditions for interconnection ) Docket No. 950985-TP  
 involving local exchange companies and )  
 alternative local exchange companies ) Filed: 12/11/95  
 pursuant to Section 364.162, Florida )  
 Statutes )  
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INTERMEDIA COMMUNICATIONS OF FLORIDA, INC.'S  
PREHEARING STATEMENT

Intermedia Communications of Florida, Inc. (Intermedia), pursuant to Order No. PSC-95-1421-PCO-TP, files this prehearing statement.

- A. Witnesses: None
- B. Exhibits: At this time, Intermedia does not plan to introduce exhibits, but reserves the right to introduce cross-examination exhibits if necessary.
- C. Intermedia's Basic Position:

The best method of interconnection compensation 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 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, the ALEC should be treated as a co-carrier.

D. ISSUES

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?

INTERMEDIA'S POSITION: The appropriate approach to interconnection is bill and keep.

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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?

INTERMEDIA'S POSITION: Yes.

ISSUE 3: What are the appropriate technical and financial billing 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 ALECs' networks?

INTERMEDIA'S POSITION: To facilitate delivery from/to carriers not directly connected to the ALEC, Southern Bell should establish a workable meet point trunking and billing arrangement with the ALEC.

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

INTERMEDIA'S POSITION: Southern Bell should compensate the ALEC for the origination of 800 traffic pursuant to the ALEC's originating switched access charges. If the ALEC provides 800 services, this arrangement should be reciprocal.

ISSUE 5(a): What are the appropriate technical arrangements for the interconnection of the respective ALECs' networks 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?

INTERMEDIA'S POSITION: The ALEC's customers must have the same level of access to reliable 911 service as do LEC customers.

ISSUE 5(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?

INTERMEDIA'S POSITION: Southern Bell should provide on-line access for immediate updates of the E-911 database.

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?

INTERMEDIA'S POSITION: The ALEC and Southern Bell should provide each other with busy line verification and emergency interrupt services pursuant to tariffed rates.

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

INTERMEDIA'S POSITION: Southern Bell should include the ALEC's customers in its directory assistance database at no charge in return for securing the value of the ALEC's customer list towards its universal listing of all users of the public switched network.

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?

INTERMEDIA'S POSITION: Without charge, Southern Bell should print the ALEC's listings in its white and yellow pages, distribute its directories to the ALEC's customers and recycle the ALEC's customers' directories.

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?

INTERMEDIA'S POSITION: The ALEC and Southern Bell should bill and clear intraLATA credit card, collect and third party calls through Southern Bell's Centralized Message Distribution Service.

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

INTERMEDIA'S POSITION: The ALEC and Southern Bell should provide LEC-to-LEC Common Channel Signalling to one another, where available and including all signalling parameters, for all traffic in order to enable full interoperability of CLASS features and functions.

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

INTERMEDIA'S POSITION: The ALEC and Southern Bell should exchange traffic using reasonably efficient routing, trunking, and signaling arrangements. The ALEC and Southern Bell should reciprocally terminate LATA-wide traffic originating on each other's network, via two-way trunking arrangements. These arrangements should be jointly provisioned and engineered.

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?

INTERMEDIA'S POSITION: Southern Bell should compensate ALECs as if the traffic had been terminated directly to the ALEC's network, except that certain transport elements should not be paid to ALECs to the extent that Southern Bell will be transporting the call on its own network.

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

INTERMEDIA'S POSITION: No position at this time.

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

INTERMEDIA'S POSITION: Assignment of NXX codes to the respective should be handled through negotiation with the LEC. Intermedia has found the LECs responsive in making these arrangements.

- E. QUESTIONS OF LAW: None.
- F. POLICY QUESTIONS: None.
- G. STIPULATED ISSUES: None.
- H. PENDING MOTIONS OR OTHER MATTERS: None.

I. REQUIREMENTS THAT CANNOT BE COMPLIED WITH: None.

Respectfully submitted this 11th day of December, 1995.



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Patrick K. Wiggins  
Wiggins & Villacorta, P.A.  
501 East Tennessee Street  
Suite B  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
(904) 222-1534

Attorneys for Intermedia  
Communications of Florida, Inc.

**CERTIFICATE OF SERVICE**

**DOCKET NO. 950985-TP**

I HEREBY CERTIFY that on this 11th day of December, 1995, a copy of the foregoing Intermedia Communications of Florida, Inc.'s Prehearing Statement has been furnished by U.S. Mail to the following:

Michael Tye  
AT&T Communications  
of the Southern States, Inc.  
106 East College Avenue, #1420  
Tallahassee, FL 32301-7733

Timothy Devine  
Metropolitan Fiber Systems  
of Florida, Inc.  
250 Williams Street, Ste. 2200  
Atlanta, GA 30303-1034

Laura Wilson  
Florida Cable Telecommunications  
Association, Inc.  
310 North Monroe Street  
Tallahassee, FL 32302

Peter Dunbar  
Pennington Law Firm  
215 South Monroe Street  
Suite 200  
P.O. Box 10095  
Tallahassee, FL 32301

Richard Melson  
Hopping Law Firm  
123 South Calhoun Street  
P.O. Box 6526  
Tallahassee, FL 32314

Jodie Donovan-May  
Teleport Communications Group  
- Washington, D.C.  
2 LaFayette Center  
1133 Twenty-First Street, N.W.  
Suite 400  
Washington, D.C. 20036

Kenneth Hoffman  
Rutledge, Ecenia, Underwood,  
P.O. Box 551  
215 South Monroe Street  
Suite 420  
Tallahassee, FL 32302

Jill Butler  
Time Warner Communications  
2773 Red Maple Ridge, Ste. 301  
Tallahassee, FL 32301

Michael J. Henry  
MCI Telecommunications Corp.  
780 Johnson Ferry Road, Ste. 700  
Atlanta, GA 30342

Lee L. Willis  
J. Jeffrey Wahlen  
McFarlane, Ausley, et al.  
227 South Calhoun Street  
Tallahassee, FL 32301

Floyd Self  
Messer Law Firm  
215 South Monroe Street  
Suite 701  
P.O. Box 1876  
Tallahassee, FL 32302

Donald Crosby  
7800 Belfront Parkway  
Suite 270  
Jacksonville, FL 32256-6925

Anthony P. Gillman  
Kimberly Caswell  
GTE Florida Incorporated  
201 North Franklin Street  
Tampa, FL 33602

Leo I. George  
Winstar Wireless of Florida,  
Inc.  
1146 19th Street, N.W., Ste. 200  
Washington, D.C. 20036

Charles W. Murphy  
Pennington Law Firm  
215 South Monroe Street  
2nd Floor  
Tallahassee, FL 32302

Charles Beck  
Deputy Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400

Clay Phillips  
Utilities & Telecommunications  
House Office Building, Room 410  
Tallahassee, FL 32399

Nels Roseland  
Executive Office of the Governor  
Office of Planning and Budget  
The Capital, Room 1502  
Tallahassee, Florida 32399-0001

Greg Krasovsky  
Commerce & Economic Opportunities  
Senate Office Building, Room 426  
Tallahassee, FL 32399

H.W. Goodall  
Continental Fiber Technologies,  
Inc.  
4455 BayMeadows Road  
Jacksonville, FL 32217-4716

Steven D. Shannon  
MCI Metro Access  
Transmission Services, Inc.  
2250 Lakeside Boulevard  
Richardson, Texas 75082

F. Ben Poag  
Sprint/United-Florida  
Sprint/Centel-Florida  
P.O. Box 165000 (M.C. #5326)  
555 Lake Border Drive  
Apopka, FL 32703

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

Patricia Kurlin  
Intermedia Communications of  
Florida, Inc.  
9280 Bay Plaza Blvd, Ste. 720  
Tampa, FL 33619-4453

David Erwin  
Young Law Firm  
P.O. Box 1833  
225 South Adams Street  
Tallahassee, FL 32302-1833

Graham A. Taylor  
TCG South Florida  
1001 West Cypress Creek Road  
Suite 209  
Ft. Lauderdale, FL 33309-1949

John Murray  
Payphone Consultants, Inc.  
3431 N.W. 55th Street  
Ft. Lauderdale, FL 33309-6308


Richard A. Gerstemeier  
Time Warner AxS of Florida, L.P.  
2251 Lucien Way, Suite 320  
Maitland, FL 32751-7023

Gary T. Lawrence  
City of Lakeland  
501 East Lemon Street  
Lakeland, FL 33801-5079

Kimberly Caswell  
c/o Richard M. Fletcher  
GTE Florida Incorporated  
106 East College Avenue  
Suite 1440  
Tallahassee, FL 32301-7704

Robin Dunsan  
AT&T  
200 Peachtree Street, N.E.  
Promenade I, Room 4038  
Atlanta, FL 30309

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

  
Patrick K. Wiggins