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BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition(s) to )  
 establish nondiscriminatory rates, terms )  
 and conditions for resale involving ) Docket No. 950984-TP  
 local exchange companies and alternative )  
 local exchange companies pursuant to ) Filed: 12/11/95  
 Section 364.161, 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: BellSouth should have to provide all of its services to certificated ALECs for the purpose of resale. Because the statute restricts resale of the LEC's flat rated local exchange residence and business service, it is imperative that the LEC be required to provide the unbundled network features and functions requested by the ALEC.

D. **ISSUES**

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

Intermedia's Position: At a minimum BellSouth should unbundle their local services into link elements, port elements, loop concentration, and loop transport.

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

Intermedia's Position: The LEC should be required to provide the unbundled elements as reasonably requested by the ALEC. In other words, the unbundled elements should be provided in the most efficient way possible, not simply according to LEC preference.

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

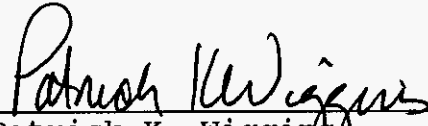
Intermedia's Position: The unbundled elements should be provided at total service long run incremental cost.

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

Intermedia's Position: There are two additional matters the Commission should consider. First, the Commission should adopt a "fresh look" policy that would allow customers of the LEC to take ALEC services rather than LEC services without triggering termination penalties under the LEC contracts. A "fresh look" policy would tend to neutralize LEC attempts to "lock up" customers in anticipation of the recent statutory revision. Intermedia is informed that the Commission may prefer not to review the "fresh look" issue in this proceeding. Second, the Commission should adopt an "imputation" test to ensure that BellSouth does not engage in predatory pricing of competitive services.

- 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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**CERTIFICATE OF SERVICE**

**DOCKET NO. 950984-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:

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