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FILE COPY

December 11, 1995

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

RE: Docket No. 950984A-TP and 950984B-TP

Dear Mrs. Bayo:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s Prehearing Statement. Please file these documents in the captioned dockets.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed in both Docket No. 950984A-TP and Docket 950984B-TP and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

ACK ✓
AFA
APP
CIC

Sincerely,

Nancy B. White (as)
Nancy B. White

Chase

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5 Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
R. D. Lackey

[Handwritten signature]

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Resolution of petition(s))
to establish nondiscriminatory) Docket No. 950984A-TP
rates, terms, and conditions for) (MFS)
resale involving local exchange) Docket No. 950985B-TP
companies and alternative local) (MCImetro)
exchange companies pursuant to)
Section 364.161, Florida Statutes) Filed: December 11, 1995
_____)

PREHEARING STATEMENT OF
BELLSOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), in compliance with the Order Regarding Further Proceeding, Order No. PSC-95-1422-PCO-TP, issued November 22, 1995, submits its Prehearing Statement for Docket No. 950984A-TP (MFS) and Docket No. 9450984B-TP (MCImetro).

A. WITNESSES

BellSouth proposes to call the following witnesses to offer direct testimony on the issues indicated below:

<u>Witnesses</u>	<u>Issues</u>
Robert Scheye	1-4
Dr. Andy Banerjee	3

In addition, BellSouth proposes to call the following witnesses to offer rebuttal testimony on the issues identified below:

<u>Witnesses</u>	<u>Issues</u>
Robert Scheye	1-4
Dr. Andy Banerjee	3

BellSouth further reserves the right to call additional rebuttal witnesses, witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be designated by

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the Prehearing Officer at the prehearing conference to be held on December 22, 1995.

B. EXHIBITS

<u>Witness</u>	<u>Document Indicator</u>	<u>Title of Exhibit</u>
Robert Scheye	RCS-1	Issues List
	RCS-2	Negotiation Items
Dr. Andy Banerjee	AXB-1	Curriculum Vitae
	AXB-2	Rebuttal Testimony Docket 950985A-TP

BellSouth reserves the right to file exhibits to any additional testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and the Rules of this Commission.

C. STATEMENT OF BASIC POSITION

The unbundled components and capabilities required under revised Chapter 364 will be significantly affected by the universal service issues being addressed in Florida Docket No. 950696-TP. Specifically, the manner in which the universal support mechanism is modified to include the required ALEC support, will affect the rate structure and rate levels for local interconnection arrangements. BellSouth's local interconnection arrangements in turn must accomodate the unbundle network components and capabilities. Therefore, BellSouth believes that issues concerning local interconnection, unbundling and universal

service should be negotiated together as part of one comprehensive package.

BellSouth already offers many features on an unbundled basis, such as loops, interoffice transport and various forms of exchange access. BellSouth also plans to offer, on an unbundled basis, ports, channel multiplexing and associated transport, and virtual collocation. BellSouth does not plan to offer sub-loop unbundling, loop concentration or connection of unbundled loops to unbundled ports. With regard to unbundling, it is BellSouth's position that the existing ONA model and criteria should be used to the extent possible to determine the feasibility of unbundling network elements, components, or capabilities. Moreover, unbundled network elements should be offered at a tariffed rate.

D. BELLSOUTH'S POSITION ON THE ISSUES

Issue No. 1: What elements should be made available by BellSouth to MFS-Florida and MCImetro on an unbundled basis (e.g., loop elements, port elements, loop concentration, and loop transport)?

Position: BellSouth plans to offer unbundled loops and associated transport, unbundled ports, channel multiplexing and associated transport, and virtual collocation. BellSouth does not plan to offer sub-loop unbundling, loop concentration, unbundling or connection of unbundled loops to unbundled ports.

Issue No. 2: What are the appropriate technical arrangements for the provision of such unbundled elements?

Position: BellSouth will make voice grade local loops available to ALECs from BellSouth's Access Services Special Access tariff. Interoffice transport facilities necessary to connect a local channel from the end user's serving wire center to the ALEC's point of interface will be available from the Access Services tariff. BellSouth will also provide an unbundled two-wire voice grade exchange port (residence, business, and PBX trunk) for connection of an ALEC's end user loop to BellSouth's public switched network. Channel multiplexing and associated transport will be offered to an ALEC as High Capacity Service from the Special Access Service tariff. BellSouth will also offer Virtual Expanded Interconnection Service (VEIS) for basic transmission facilities, subject to the availability of space and facilities in each BellSouth location.

Issue No. 3: What are the appropriate financial arrangements for each such unbundled element?

Position: For those unbundled network elements that BellSouth has already tariffed, the current tariff rate is the appropriate level. BellSouth plans to price or rate unbundled ports on a measured basis consisting of a monthly rate and a usage rate, identical to that of Shared Tenant Service contained in Section A23 of BellSouth's General Subscriber Service Tariff (GSST).

Issue No. 4: What arrangements, if any, are necessary to address other operational issues?

Position: It is premature for the Commission to address operational issues. The Company believes that these issues can be negotiated to the mutual satisfaction of all parties. If negotiations fail, MFS-FL and MCImetro have the right to file a complaint with the Commission in order to resolve any issues they feel necessary.

E. STIPULATIONS

There has been a Stipulation and Agreement entered into by BellSouth, the Florida Cable Telecommunications Association, and Time-Warner, and potentially other parties, addressing Docket No. 950985-TP, Docket No. 950985A-TP, Docket No. 950985D-TP, Docket No. 950984-TP, Docket No. 950696-TP, and Docket No. 950737-TP.

F. PENDING MOTIONS

There is a Joint Motion for Acceptance of Stipulation and Agreement and For Partial Stay of Proceeding filed by BellSouth, Florida Cable Telecommunications Association, and Time-Warner on December 8, 1995.

G. OTHER REQUIREMENTS

BellSouth knows of no requirements set forth in any prehearing order with which it cannot comply.

Respectfully submitted this 11th day of December, 1995.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE

Docket No. 950984A-TP

Docket No. 950984B-TP

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Federal Express this 11th day of December, 1995 to:

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