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December 22, 1995

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center Room 110 Tallahassee, Florida 32399-0850

Docket No. 950985-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Teleport Communications Group Inc. are the following documents:

Original and fifteen copies of the Amended Prehearing Statement of Teleport Communications Group Inc.; and

A disk in Work Perfect 6.0 containing a copy of the AFA Amended Prehearing Statement entitled "TELEPORT\PREHEARI.AME". -Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me. Thank you for your assistance with this filing. Sincerely, EAG Kenneth A. Hoffman cc: All Parties of Record

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

FPSC-RECORDS/REPORTING DOCUMENT NUMBER-DATE

12943 DEC 22 #

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Resolution of Petition(s))
to establish nondiscriminatory)
rates, terms, and conditions for)
interconnection involving local)
exchange companies and alternative)
local exchange companies pursuant)
to Section 364.162, Florida)
Statutes.

Docket No. 950985-TP

Filed: December 22, 1995

AMENDED PREHEARING STATEMENT OF TELEPORT COMMUNICATIONS GROUP INC.

Pursuant to Rule 25-22.038(3), Florida Administrative Code, and Order No. PSC-95-1421-PCO-TP Regarding Further Proceedings, Teleport Communications Group Inc., on behalf of its affiliate, TCG South Florida (hereinafter referred to collectively as "TCG"), by and through its undersigned counsel, hereby submits its Amended Prehearing Statement to the Florida Public Service Commission ("Commission") in the above captioned docket.

A. WITNESSES

TCG will not sponsor any witnesses in this proceeding.

B. EXHIBITS

TCG will not sponsor any exhibits in this proceeding.

C. BASIC POSITION

TCG is a certificated alternative local exchange company in Florida. TCG requires technically and operationally feasible and economically viable interconnection arrangements with BellSouth Telecommunications, Inc. ("BellSouth") in order to ensure seamless integration of the companies' networks. Consistent with Section 364.162, Florida Statutes, TCG and BellSouth entered into a Stipulation and Agreement in December, 1995 (the "December, 1995

DOCUMENT NUMBER-DATE

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Stipulation and Agreement") resolving, inter alia, the issues raised in TCG's Petition filed on August 31, 1995 in Docket No. 950985-TP and providing for fair and reasonable rates, terms and interconnection. conditions for The Florida Cable Telecommunications Association, Inc., Continental Cablevision, Inc. and Time Warner AxS/Digital Media Partners also have entered into the same December, 1995 Stipulation and Agreement with BellSouth. The December, 1995 Stipulation and Agreement was approved by the Commission on December 19, 1995 and is attached as Exhibit A to the Notice of Voluntary Dismissal filed by TCG on December 20, 1995, as amended on December 21, 1995, in Docket No. 950985-TP.

TCG remains a party to the other dockets in this proceeding and reserves its right to participate for the purpose of addressing potential discriminatory or anticompetitive impacts of the Commissions's determinations in this proceeding.

D. STATEMENT OF ALL QUESTIONS OF FACT, LAW AND POLICY

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?

TCG'S POSITION: The Commission should approve an interconnection rate structure, rates or other arrangements which do not have anticompetitive or discriminatory impacts on TCG.

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?

TCG'S POSITION: Yes. BellSouth should tariff its interconnection rate and other technical interconnection arrangements.

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 ALECs' network?

TCG'S POSITION: The Commission should resolve this issue in a manner which is not anticompetitive or discriminatory with respect to TCG.

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?

TCG'S POSITION: The Commission should resolve this issue in a manner which is not anticompetitive or discriminatory with respect to TCG.

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?

TCG'S POSITION: The Commission should resolve this issue in a manner which is not anticompetitive or discriminatory with respect to TCG.

<u>Issue 5(b)</u>: What procedures should be in place for the timely exchange and updating of the respective ALECs customer information for inclusion in appropriate E911 databases?

TCG'S POSITION: The Commission should resolve this issue in a manner which is not anticompetitive or discriminatory with respect to TCG.

<u>Issue 6</u>: 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?

TCG'S POSITION: The Commission should resolve this issue in a manner which is not anticompetitive or discriminatory with respect to TCG.

<u>Issue 7</u>: What are the appropriate arrangements for the provision of directory assistance services and data between the respective ALECs and Southern Bell?

TCG'S POSITION: The Commission should resolve this issue in a manner which is not anticompetitive or discriminatory with respect to TCG.

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?

TCG'S POSITION: The Commission should resolve this issue in a manner which is not anticompetitive or discriminatory with respect to TCG.

<u>Issue 9</u>: 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?

TCG'S POSITION: TCG and BellSouth should bill and clear intraLATA credit card, collect and third party calls (calls where the recording company is different from the billing company) through Centralized Message Distribution Service provided by BellSouth.

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

TCG'S POSITION: The Commission should resolve this issue in a manner which is not anticompetitive or discriminatory with respect to TCG.

<u>Issue 11</u>: What are the appropriate arrangements for physical interconnection between the respective ALECs and Southern Bell, including trunking and signalling arrangements?

TCG'S POSITION: The Commission should resolve this issue in a manner which is not anticompetitive or discriminatory with respect to TCG.

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.

TCG'S POSITION: ALECs that receive a call forwarded under an interim number portability arrangement must receive all access charges associated with the "ported" number.

TCG'S POSITION: No position.

TCG'S POSITION: The Commission should resolve this issue in a manner which is not anticompetitive or discriminatory with respect to TCG.

E. STIPULATED ISSUES

As indicated above, TCG and BellSouth entered into a Stipulation and Agreement in December, 1995 resolving all issues in this proceeding. Said Stipulation and Agreement was approved by the Commission on December 19, 1995.

F. PENDING MOTIONS

TCG has no pending motions.

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G. OTHER REQUIREMENTS

TCG is not aware at this time of any requirements set forth in the Order Establishing Procedure of in the Order regarding Further Proceedings with which it cannot comply.

Respectfully submitted,

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and

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Counsel for TCG

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing TCG's Status Report was furnished by U. S. Mail this 22nd day of December, 1995, to the following:

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By: KENNETH A. HOFFMAN

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