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U

RUTLEDGE, ECENIA, UNDERWOOD, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA
KENNETH A. HOFFMAN
THOMAS W. KONRAD
R. DAVID PRESCOTT
HAROLD F. X. PURNELL
GARY R. RUTLEDGE
R. MICHAEL UNDERWOOD
WILLIAM B. WILLINGHAM

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (904) 681-6788
TELECOPIER (904) 681-6515

January 25, 1996

GOVERNMENTAL CONSULTANTS:
ORIGINAL FILE COPY

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

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Re: Docket No. 950985-TP

FPSC-RECORDS/REPORTING

Dear Ms. Bayo:

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

1. Original and fifteen copies of Teleport Communications Group Inc.'s Posthearing Statement of Issues and Positions; and
2. A disk in Word Perfect 6.0 containing a copy of the document entitled "Posthear.Bri".

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,



Kenneth A. Hoffman

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cc: All Parties of Record

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Resolution of Petition(s))
to establish nondiscriminatory)
rates, terms, and conditions for) Docket No. 950985-TP
interconnection involving local)
exchange companies and alternative) Filed: January 25, 1996
local exchange companies pursuant)
to Section 364.162, Florida)
Statutes.)
_____)

**TELEPORT COMMUNICATIONS GROUP INC.'S
POSTHEARING STATEMENT OF ISSUES AND POSITIONS**

Pursuant to Rule 25-22.056, Florida Administrative Code, and Order No. PSC-96-0011-PHO-TP ("Prehearing Order"), issued January 4, 1996, 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 Posthearing Brief to the Florida Public Service Commission ("Commission") in the above captioned docket.

I. INTRODUCTION

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 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 conditions for interconnection. The December 1995 Stipulation and

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Agreement was admitted into the record as part of Exhibit 15 (RCS-7).

TCG has remained a party to this docket, and to other dockets related to this proceeding, for the purpose of addressing potential discriminatory or anticompetitive impacts of the Commission's determinations in these proceedings. TCG maintains that the Commission should resolve the issues raised in this proceeding in a manner which is not anticompetitive or discriminatory with respect to TCG. Recently, in Order No. PSC-96-0082-AS-TP issued January 17, 1996 (Order approving the December, 1995 Stipulation and Agreement), the Commission confirmed that any decision that it makes in this proceeding must be nondiscriminatory with respect to the parties, such as TCG, who successfully negotiated interconnection rates.

TCG also maintains that TCG and BellSouth should bill and clear intraLATA credit card, collect, and third party calls through Centralized Message Distribution Service provided by BellSouth, and that ALECs that receive a call forwarded under an interim number portability arrangement must receive all access charges associated with the "ported" number.

II. ISSUES AND POSITIONS

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?

*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?

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?

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?

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?

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

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?

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

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?

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

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

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?

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

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?

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.

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

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

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

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.

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

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

No position.

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

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

Respectfully submitted,


KENNETH A. HOFFMAN, ESQ.
WILLIAM B. WILLINGHAM, ESQ.
RUTLEDGE, ECENIA, UNDERWOOD,
PURNELL & HOFFMAN, P.A.
P. O. Box 551
Tallahassee, FL 32302-0551
(904) 681-6788

and

JODIE DONOVAN-MAY, ESQ.
TCG - Washington, D.C.
2 Lafayette Centre
Suite 400
1133 Twenty First Street, NW
Washington, D.C. 20036
(202) 739-0010

Counsel for TCG

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing TCG's Posthearing Brief was furnished by United States Mail this 25th day of January, 1996, to the following:

Lee L. Willis, Esq.
J. Jeffrey Wahlen, Esq.
MacFarlane, Ausley, et al.
227 S. Calhoun Street
Tallahassee, FL 32301

Anthony P. Gillman, Esq.
Kimberly Caswell, Esq.
GTE Florida Incorporated
P. O. Box 110, FLTC0007
Tampa, FL 31601-0110

Steven D. Shannon
MCI Metro Access Transmission
Svc., Inc.
2250 Lakeside Blvd.
Richardson, TX 75082

Leslie Carter
Digital Media Partners
1 Prestige Place, Suite 255
2600 McCormack Drive
Clearwater, FL 34619-1098

F. Ben Poag
Sprint/United-Florida
Sprint/Centel-Florida
P. O. Box 165000 (M.C. #5326)
Altamonte Springs, FL 32716-
5000

James C. Falvey, Esq.
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, DC 20007

David Erwin, Esq.
P. O. Box 1833
Tallahassee, FL 32302-1833

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

Leo I. George
Lonestar Wireless of Florida,
Inc.
1146 19th Street, N.W., Suite
200
Washington, DC 20036

Charles W. Murphy, Esq.
Pennington Law Firm
P. O. Box 10095
Tallahassee, FL 32302

Patrick K. Wiggins, Esq.
Wiggins & Villacorta, P.A.
P. O. Drawer 1657
Tallahassee, FL 32302

Andrew D. Lipman
Metropolitan Fiber Systems of
Florida, Inc.
One Tower Lane, Suite 1600
Oakbrook Terrace, IL 60181-4630

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

Richard D. Melson, Esq.
P. O. Box 6526
Tallahassee, FL 32314

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

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

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

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

Ms. Jill Butler
2773 Red Maple Ridge
Tallahassee, FL 32301

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

Bill Tabor
Utilities & Telecommunications
Room 410
House Office Bldg.
Tallahassee, FL 32399

Greg Krasovsky
Commerce & Economic
Opportunities
Room 4265
Senate Office Bldg.
Tallahassee, FL 32399

Charles Beck, Esq.
Office of Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Nels Roseland
Executive Office of the
Governor
Office of Planning & Budget
The Capitol, Room 1502
Tallahassee, FL 32399

Donna Canzano, Esq.
Division of Legal Services
2540 Shumard Oak Boulevard
Room 370
Tallahassee, FL 32399-0850

Floyd R. Self, Esq.
Messer, Caparello, et al.
P. O. Box 1876
Tallahassee, FL 32302

Michael W. Tye, Esq.
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301

Robin D. Dunson, Esq.
1200 Peachtree Street, NE
Promenade I, Room 4038
Atlanta, GA 30309

Sue E. Weiske
Senior Counsel
Time Warner Communications
160 Inverness Drive West
Englewood, CO 80112

Laura L. Wilson, Esq.
FCTA
310 N. Monroe Street
Tallahassee, FL 32301

Donald L. Crosby, Esq.
Continental Cablevision, Inc.
Southeastern Region
7800 Belfort Parkway, St. 270
Jacksonville, FL 32256-6925

C. Everett Boyd, Jr., Esq.
Ervin, Varn, Jacobs, Odom &
Kitchen
P. O. Drawer 1170
Tallahassee, FL 32302

By: 
KENNETH A. HOFFMAN

I:\USERS\ROXANNE\TELEPORT\POSTHEAR.BRI