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Florida Cable Telecommunications Association

Steve Wilkerson, President

January 29, 1996

ORIGINAL
FILE COPY

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: DOCKET NO. 950984-TP

Dear Ms. Bayo:

Enclosed for filing in the above-captioned docket are an original and fifteen copies of Florida Cable Telecommunications Association, Inc.'s ("FCTA") Posthearing Brief. Copies have been served on the parties of record pursuant to the attached certificate of service.

Also enclosed is a copy on a 3-1/2" diskette in WordPerfect format, version 5.1.

Please acknowledge receipt and filing of the above by date stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing.

ACK _____ Yours very truly,

AFA _____

APP _____
DAF _____ *Laura L. Wilson*

LMU *Chore* Laura L. Wilson
Vice President, Regulatory Affairs
& Regulatory Counsel

EAG _____
EG 1 Enclosures

JIN 5 cc: Mr. Steven E. Wilkerson
All Parties of Record

DPC _____

RCH _____

SEC 1

WAS _____

OTH _____

RECEIVED & FILED

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FPC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

310 North Monroe Street • Tallahassee, Florida 32301 • (904) 681-1990 FAX (904) 681-9676
01031 JAN 29 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition(s) to Establish)
Nondiscriminatory Rates, Terms, and)
Conditions for Resale Involving Local)
Exchange Companies Pursuant to Section)
364.161, Florida Statutes)
_____)

DOCKET NO. 950984-TP

FILED: January 29, 1996

**FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION, INC.'S
POSTHEARING BRIEF**

The Florida Cable Telecommunications Association, Inc., ("FCTA") pursuant to Order No. PSC-95-1083-PCO-TP Rule 25-22.056(3), Florida Administrative Code, respectfully submits to the Florida Public Service Commission ("Commission") its posthearing brief in the above-captioned docket.

I. BASIC POSITION

The Commission has approved a settlement containing rates, terms and conditions for certain unbundled BellSouth services. The Commission should approve no rate, term or condition in this proceeding that would create an anticompetitive or discriminatory result between ALECs operating in BellSouth territory. Additionally, the Commission has opened a docket to address imputation issues. That docket could easily be expanded to include appropriate standards for LEC services provided to ALECs.

II. ISSUES

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

DOCUMENT NUMBER-DATE

01031 JAN 29 1996

FPSC-RECORDS/REPORTING

***POSITION:** The Commission has approved a settlement containing rates, terms and conditions for certain unbundled services. The Commission should approve no rate, term or condition in this proceeding that would create an anticompetitive result. *

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

***POSITION:** The Commission has approved a settlement containing rates, terms and conditions for certain unbundled services. The Commission should approve no rate, term or condition in this proceeding that would create an anticompetitive result. *

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

***POSITION:** The Commission has approved a settlement containing rates, terms and conditions for certain unbundled services. The Commission should approve no rate, term or condition in this proceeding that would create an anticompetitive result. Additionally, the Commission has opened a docket to address imputation issues. That docket could easily be expanded to include appropriate standards for LEC services provided to ALECs.*

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

***POSITION:** The Commission has approved a settlement containing rates, terms and conditions for certain unbundled services. The Commission should approve no rate, term or condition in this proceeding that would create an anticompetitive result. Additionally, the Commission has opened a docket to address imputation issues. That docket could easily be expanded to include appropriate standards for LEC services provided to ALECs.*

RESPECTFULLY SUBMITTED this 29th day of January, 1996.



Laura L. Wilson, Esquire
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CERTIFICATE OF SERVICE
DOCKET NO 950984-TP

I **HEREBY CERTIFY** that a true and correct copy of the foregoing been furnished by Hand Delivery(*) and/or U.S. Mail on this 29th day of January, 1996 to the following parties of record:

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