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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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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. 950985A-TP
Docket No. 950985D-TP
Filed: January 30, 1996

INTERMEDIA COMMUNICATIONS OF FLORIDA, INC.'S
PREHEARING STATEMENT

Intermedia Communications of Florida, Inc. (Intermedia), files this prehearing statement regarding Sprint/United and Sprint/Centel ("Sprint") in the above docket.

- 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:

The best method of interconnection compensation is a bill and keep arrangement. This is the method that local exchange companies (LECs) use today for local interconnection with one another. Bill and keep is administratively simple, and allows competitors to choose a network architecture which is most efficient. In addition, bill and keep is most likely to produce the benefits of competition for consumers. In technical interconnection arrangements, the ALEC should be treated as a co-carrier.

D.

ISSUES

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 Sprint?

INTERMEDIA'S POSITION: The appropriate approach to interconnection is bill and keep.

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ISSUE 2: If the Commission sets rates, terms and conditions for interconnection between the respective ALECS and Sprint, should Sprint tariff the interconnection rate(s) or other arrangements?

INTERMEDIA'S POSITION: Yes.

ISSUE 3: What are the appropriate technical and financial billing arrangements which should govern interconnection between the respective ALECs and Sprint for the delivery of calls originated and/or terminated from carriers not directly connected to the respective ALECs' networks?

INTERMEDIA'S POSITION: To facilitate delivery from/to carriers not directly connected to the ALEC, Sprint should establish a workable meet point trunking and billing arrangement with the ALEC.

ISSUE 4: What are the appropriate technical and financial requirements for the exchange of intraLATA 800 traffic which originates from the respective ALECs' customers and terminates to an 800 number served by or through Sprint?

INTERMEDIA'S POSITION: Sprint should compensate the ALEC for the origination of 800 traffic pursuant to the ALEC's originating switched access charges. If the ALEC provides 800 services, this arrangement should be reciprocal.

ISSUE 5(a): What are the appropriate technical arrangements for the interconnection of the respective ALECs' networks to Sprint'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 Sprint?

INTERMEDIA'S POSITION: The ALEC's customers must have the same level of access to reliable 911 service as do LEC customers.

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?

INTERMEDIA'S POSITION: Sprint should provide on-line access for immediate updates of the E-911 database.

ISSUE 6: What are the appropriate technical and financial requirements for operator handled traffic flowing between the respective ALECs and Sprint including busy line verification and emergency interrupt services?

INTERMEDIA'S POSITION: The ALEC and Sprint should provide each other with busy line verification and emergency interrupt services pursuant to tariffed rates.

ISSUE 7: What are the appropriate arrangements for the provision of directory assistance services and data between the respective ALECs and Sprint?

INTERMEDIA'S POSITION: Sprint should include the ALEC's customers in its directory assistance database at no charge in return for securing the value of the ALEC's customer list towards its universal listing of all users of the public switched network.

ISSUE 8: Under what terms and conditions should Sprint 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?

INTERMEDIA'S POSITION: Without charge, Sprint should print the ALEC's listings in its white and yellow pages, distribute its directories to the ALEC's customers and recycle the ALEC's customers' directories.

ISSUE 9: What are the appropriate arrangements for the provision of billing and collection services between the respective ALECs and Sprint, including billing and clearing credit card, collect, third party and audiotext calls?

INTERMEDIA'S POSITION: The ALEC and Sprint should bill and clear intraLATA credit card, collect and third party calls through Sprint's Centralized Message Distribution Service.

ISSUE 10: What arrangements are necessary to ensure the provision of CLASS/LASS services between the respective ALECs and Sprint?

INTERMEDIA'S POSITION: The ALEC and Sprint should provide LEC-to-LEC Common Channel Signalling to one another, where available and including all signalling parameters, for all traffic in order to enable full interoperability of CLASS features and functions.

ISSUE 11: What are the appropriate arrangements for physical interconnection between the respective ALECs and Sprint, including trunking and signalling arrangements?

INTERMEDIA'S POSITION: The ALEC and Sprint should exchange traffic using reasonably efficient routing, trunking, and signaling arrangements. The ALEC and Sprint should reciprocally terminate LATA-wide traffic originating on each other's network, via two-way trunking arrangements. These arrangements should be jointly provisioned and engineered.

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?

INTERMEDIA'S POSITION: Sprint should compensate ALECs as if the traffic had been terminated directly to the ALEC's network, except that certain transport elements should not be paid to ALECs to the extent that Sprint will be transporting the call on its own network.

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

INTERMEDIA'S POSITION: No position at this time.

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

INTERMEDIA'S POSITION: Assignment of NXX codes to the respective should be handled through negotiation with the LEC. Intermedia has found the LECs responsive in making these arrangements.

- 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 30th day of January, 1996.

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CERTIFICATE OF SERVICE

DOCKET NO. 950985-TP

I HEREBY CERTIFY that on this 30th day of January, 1996, 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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