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February 6, 1996

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

ORIGINAL
FILE COPY

Re: Docket No. 950985-TP
MFS/SPRINT UNITED/CENDEL

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket
are an original and fifteen (15) copies of the Direct
Testimony of Mike Guedel on behalf of AT&T.

Copies of the foregoing are being served on all parties
of record in accordance with the attached Certificate of
Service.

CK ✓
TA _____
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Yours truly,

Michael W. Tye
Michael W. Tye

Attachments

cc: J. P. Spooner, Jr.
Parties of Record

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14
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
01320 FEB-6 96
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

DOCKET NO. 950985-TP

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by next day express mail, U. S. Mail or hand-delivery to the following parties of record this 6th day of February, 1996.

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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 ALTERNATE
LOCAL EXCHANGE COMPANIES
PURSUANT TO SECTION
364.162, FLORIDA STATUTES

DOCKET NO. 950985-TP
(MFS/UNITED PORTION)

DIRECT TESTIMONY OF

MIKE GUEDEL

ON BEHALF OF AT&T COMMUNICATIONS

OF THE SOUTHERN STATES, INC.

FEBRUARY 6, 1995

DOCUMENT NUMBER-DATE

01320 FEB-6 88

FPSC-RECORDS/REPORTING

1 Q. WILL YOU PLEASE IDENTIFY YOURSELF?

2

3 A. My name is Mike Guedel and my business address
4 is AT&T, 1200 Peachtree Street, NE, Atlanta,
5 Georgia, 30309. I am employed by AT&T as
6 Manager-Network Services Division.

7

8

9 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS
10 DOCKET?

11

12 A. Yes. I filed testimony in this docket on
13 January 5, 1996.

14

15

16 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

17

18 A. The purpose of my testimony is to ensure that
19 the positions of AT&T are fully represented in
20 this portion of the docket regardless of how
21 its procedural course unfolds.

22

23

24

25

1 Q. WHAT ARE YOUR POSITIONS ON THE ISSUES THAT HAVE
2 BEEN RAISED BY METROPOLITAN FIBER SYSTEMS OF
3 FLORIDA (MFS) IN ITS PETITION AND TESTIMONY?
4

5 A. Essentially MFS has offered testimony
6 addressing many of the issues previously
7 identified through the testimony of another
8 petitioner (i.e., Time Warner) in an earlier
9 portion of this docket. AT&T's positions on
10 these issues, particularly with respect to
11 "Bill and Keep" and mutual compensation
12 arrangements, are the same as expressed in
13 previously filed AT&T testimony. Therefore, in
14 the interests of avoiding repetition, and of
15 potentially saving some trees, I would like to
16 adopt the testimony that I had filed on January
17 5, 1996 in an earlier portion of this docket.

18
19

20 Q. ARE THERE ANY ADDITIONAL ISSUES DIRECTLY RAISED
21 THROUGH THE PETITION AND/OR TESTIMONY OF MFS
22 THAT AT&T DID NOT HAVE THE OPPORTUNITY TO
23 ADDRESS IN THE EARLIER PORTION OF THIS DOCKET?
24

25

1 A. Yes. MFS Specifically discusses the
2 appropriate billing of the residual
3 interconnection charge (RIC) in an access
4 situation where an incumbent LEC provides
5 tandem switching and MFS (or other ALEC)
6 provides the end office switching. This issue
7 was not specifically raised in the earlier
8 portion of this docket.

9

10

11 Q. SPRINT/UNITED HAS APPARENTLY TAKEN THE POSITION
12 THAT IF IT PROVIDES THE TANDEM SWITCHING IN A
13 MEET-POINT SWITCHED ACCESS ARRANGEMENT (I.E., A
14 SITUATION WHERE MFS SUBTENDS A SPRINT/UNITED
15 TANDEM) THAT IT (SPRINT/UNITED) SHOULD BILL AND
16 KEEP ITS RESIDUAL INTERCONNECTION CHARGE (RIC).
17 DO YOU SUPPORT THAT POSITION?

18

19

20 A. No. The RIC has been purposefully dissociated
21 from the local transport function and
22 associated with end office switching in the
23 Local Transport Restructure (LTR) environment.
24 Sprint/United has traditionally supported this
25 arrangement. In a situation where a company

1 (CAP, LEC, etc.) provides local transport and
2 Sprint/United provides the end office
3 switching, it would likely be Sprint/United's
4 position that it (Sprint/United) should be
5 entitled to bill the RIC. The same rules
6 should apply to ALECs. In a meet point
7 arrangement where an ALEC provides the end
8 office switching, Sprint/United should not be
9 entitled to RIC revenue.

10

11 Of course the optimal solution would be to
12 eliminate the billing of the RIC altogether.
13 There is no underlying direct cost associated
14 with the RIC and even with its elimination,
15 Sprint/United's switched access charges would
16 still be many hundred percent above cost.

17

18 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

19

20 **A. Yes.**