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February 20, 1996

Via Federal Express

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

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STATE OF FLORIDA  
MALLARD ST

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. 950984-TP) (Petition of MFS-FL for Interconnection with United/Centel)

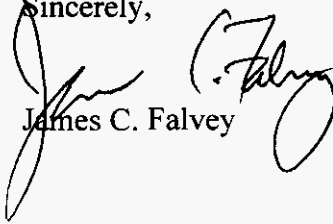
Dear Mrs. Bayo:

Enclosed for filing are an original and fifteen (15) copies of the Rebuttal Testimony of Timothy T. Devine and Prehearing Statement of Metropolitan Fiber Systems of Florida, Inc. in the above-captioned docket.

A copy of the Prehearing Statement on diskette is enclosed pursuant to Rule 25-22-028(1). Also enclosed are extra copies of the documents. Please date stamp the extra copies, and return them in the enclosed self-addressed envelope.

Thank you for your attention to this matter.

Sincerely,



James C. Falvey

All parties of record

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- DMU *Chase*
- STR \_\_\_\_\_
- EAG \_\_\_\_\_
- .EG *1*
- .IN *Schwarz*
- IPC \_\_\_\_\_
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- IEC *1*
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WASHINGTON, D.C. 20007-5116

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BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

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Resolution of Petition(s) to establish )  
nondiscriminatory rates, terms, and ) Docket No. 950984-TP  
conditions for resale involving local )  
exchange companies and alternative ) Filed: February 21, 1996  
local exchange companies pursuant )  
to Section 364.161, Florida Statutes )  
)

PREHEARING STATEMENT OF  
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.  
(Petition of MFS-FL Re: United/Centel)

Pursuant to Rule 25-22.038(3), Florida Administrative Code, Metropolitan Fiber Systems of Florida, Inc. ("MFS-FL"), by its undersigned attorneys, hereby files this prehearing statement in the Commission's proceeding concerning the unbundling of United/Centel's network features, functions and capabilities, including local loops.

- (a) the name of all known witnesses that may be called by the party, and the subject matter of their testimony;

Timothy T. Devine will testify as to the appropriate arrangements for the unbundling of United/Centel loops, ports, and other network features, functions, and capabilities (as defined by the list of issues in this proceeding), including the appropriate rates for such unbundled elements. He will also respond to proposals by other parties on these issues.

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- (b) a description of all known exhibits that may be used by the party, whether they may be identified on a composite basis, and the witness sponsoring each;**

Timothy Devine, on behalf of MFS-FL, will sponsor Exhibits TTD-1 through TTD-7 attached to its Direct and Rebuttal Testimony in this docket. Exhibits TTD-1 through TTD-5 are the correspondence between United/Centel and MFS-FL in their recent unbundling negotiations. Exhibit TTD-6 is a chart demonstrating the network elements that MFS-FL has requested be unbundled. Exhibit TTD-7 is an agreement on interconnection issues and unbundled network elements recently signed by MFS-FL and GTE.

- (c) a statement of basic position in the proceeding;**

United/Centel must unbundle and separately price and offer two-wire and four-wire, analog and digital loop and port elements such that MFS-FL will be able to lease and interconnect to whichever of these unbundled elements MFS-FL requires and to combine the United/Centel-provided elements with facilities and services that MFS-FL may provide itself. United/Centel should price these unbundled elements at Long Run Incremental Cost, subject to the pricing guidelines recommended in this proceeding by MFS-FL. United/Centel should permit ALECs to collocate digital loop carrier systems, or alternatively, unbundle United/Centel digital loop carrier systems.

- (d) MFS offers the following prehearing positions on the questions of law, fact and public policy identified for disposition in this docket.**

1. Issue: What elements should be made available by United/Centel and GTEFL to MFS-FL on an unbundled basis (e.g. link elements, port elements, loop concentration, loop transport)?

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Position: MFS-FL seeks unbundled access and interconnection to two-wire and four-wire analog and digital loops and ports. MFS-FL also seeks the capability to perform loop concentration, either through collocation of its own digital loop carriers, or by connecting to United/Centel digital loop carrier systems at United/Centel's wire centers.

2. Issue: What are the appropriate technical arrangements for each such unbundled element?

Position: Interconnection should be achieved via collocation arrangements MFS-FL will maintain at the wire center at which the unbundled elements are resident. MFS-FL also must be able to install digital loop carriers at United/Centel virtual collocation sites. United/Centel should unbundle and separately price and offer these elements.

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

Position: United/Centel's direct LRICs are the appropriate price for unbundled loops and other elements. Furthermore: 1) the sum of the prices of the unbundled rate elements must be no greater than the price of the bundled dial-tone line; 2) the price to LRIC ratio for each element and for the bundled dial-tone line must also be equal.

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

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Position: United/Centel should apply all transport-based and switch-based features grades-of-service, etc. which apply to bundled service to unbundled links. United/Centel should permit any customer to convert its bundled service to an MFS-FL unbundled service with no penalties. United/Centel should provide MFS-FL with the appropriate billing and electronic file transfer arrangements.

**(g) a statement of issues that have been stipulated to by the parties;**

Despite a certain amount of progress in negotiations, no issues have been stipulated to by the parties.

**(h) a statement of all pending motions or other matters the party seeks action upon;**

MFS-FL has no pending motions or other matters that it seeks action upon at this time.

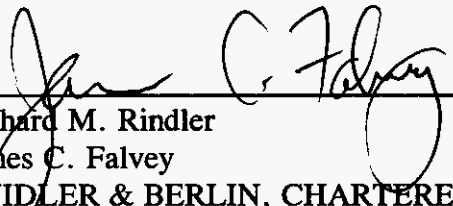
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- (i) a statement as to any requirement set forth in the prehearing order that cannot be complied with, and the reasons therefor.

None.

Respectfully submitted,

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Dated: February 21, 1996