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Florida Cable Telecommunications Association

Steve Wilkerson, President

April 4, 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-referenced 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 _____
CAF _____
Laura L. Wilson

CMU Laura L. Wilson
Vice President, Regulatory Affairs &
CTR _____ Regulatory Counsel

EAG _____
LEG Enclosures

LIN cc: Mr. Steven E. Wilkerson
OPC _____ All Parties of Record

RCH _____

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DOCUMENT NUMBER-DATE

03859 APR-4 96
EPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s) to)
establish non-discriminatory rates,)
terms and conditions for resale)
involving local exchange companies)
and alternative local exchange)
companies pursuant to Section 364.161,)
Florida Statutes)
_____)

DOCKET NO. 950984-TP

FILED: April 4, 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 and 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

Pursuant to Section 364.161, Florida Statutes, the LECs must, upon request, unbundle their network features, functions and capabilities, including access to signaling databases, systems and routing processes and offer them to any other telecommunications company requesting them to the extent technically and economically feasible. FCTA supports the unbundling of links, ports, loop transport and loop concentration on a tariff basis. Additional items should be handled upon request. FCTA further believes that imputation requirements for incumbent LECs are necessary to avoid a price squeeze on new entrants who lack market power.

DOCUMENT NUMBER-DATE

03859 APR -4 96

FPSC-RECORDS/REPORTING

1308

II. ISSUES

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

***POSITION:** Such elements currently include links, ports, loop transport and loop concentrations.*

DISCUSSION: FCTA supports MFS and MCImetro requests for unbundled links, ports, loop transport and loop concentration. The unbundling of these LEC elements is technically and economically feasible. It will promote competition and the development of consumer choice.

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

***POSITION:** Unbundled elements should be made available at interconnection points between the LEC and ALEC network. This availability of unbundled features will promote the development of consumer choice.*

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

***POSITION:** LECs should not be required to price their retail services at a deep discount for use by resellers. An aggressive policy simply to promote "rebranding" of local service elements will deter the development of facilities-based competition. LEC imputation requirements are necessary to avoid a price squeeze.*

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

***POSITION:** The LECs should provide ordering, repair, testing and any other administrative systems needed on an automated basis, wherever possible.*

RESPECTFULLY SUBMITTED this 4th day of April, 1996.



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CERTIFICATE OF SERVICE
DOCKET NO 950984-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

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