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September 9, 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

960838-TP

Re: Supplement to Pre-Hearing Statement

Dear Mrs. Bayo:

Enclosed for filing please find an original and 15 copies of the above Supplement to Pre-Hearing Statement. Please date stamp the extra copy and return the same in the enclosed self-addressed envelope.

Also enclosed is a computer disk formatted in WordPerfect 6.1 for Windows containing the document.


If there are any questions concerning this matter, please contact me.

Sincerely,


Lawrence R. Freedman

- ACK
- AFA _____
- APP _____
- CAF _____ cc:
- CMU
- CTR _____
- EAG _____
- LEG 2
- LIN 5
- OPC _____
- RC _____
- SEC 1
- WAS _____
- OTH _____

cc: Andrew D. Lipman, Esq.
Michael Billmeier, Esq. (via telecopier and Federal Express)
Mr. J. Jeffry Wahlen, Esq. (via telecopier and Federal Express)

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DIRECTOR, BUREAU OF RECORDS

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09605 SEP 10 96
FPSC-RECORDS/REPORTING

09605 SEP 10 1996

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the matter of)
)
MFS COMMUNICATIONS COMPANY, INC.)
)
Petition for Arbitration Pursuant to 47 U.S.C.)
§ 252(b) of Interconnection Rates, Terms, and)
Conditions with)
)
SPRINT UNITED-CENDEL OF FLORIDA, INC.)
_____)

Docket No. 960838-TP

SUPPLEMENT TO PRE-HEARING STATEMENT

MFS Communications Company, Inc. ("MFS"), by and through undersigned counsel, hereby supplements its Pre-Hearing Statement pursuant to the Pre-Hearing Conference conducted on September 5, 1996, and respectfully states as follows:

MFS' Position on (Revised) Issue 12

ISSUE 12:

What are the appropriate arrangements for the following:

- a. Interconnection between MFS and other collocated entities.
- b. 911/E-911.
- c. Directory listings and distribution.
- d. Directory assistance service.
- e. Yellow page maintenance.
- f. Transfer of service announcements.
- g. Coordinated repair calls.
- h. Busy line verify and interrupt.
- i. Information pages.
- j. Operator reference database.

DOCUMENT NUMBER-DATE

09605 SEP 10 96

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MFS POSITION:

MFS believes that the service platforms identified in sub-parts (a) through (j) of Issue 12 should be shared by a competing carrier in order to permit customers to receive similar services. In further explanation and support of its position, MFS refers to the Direct Testimony of Timothy Devine filed with the Petition on July 17, 1996, at 50 - 55, and to the [proposed] comprehensive interconnection agreement dated July 3, 1996, also filed with the Petition on July 17, 1996 (the "CIA"). While noting that various provisions of the CIA may affect these issues, MFS refers to the following specific provisions of the CIA, among others, as reflecting MFS' positions on the issues raised in Issue 12:

- a. Interconnection between MFS and other collocated entities. See CIA §§ 4, 5, 9, and 12.
- b. 911/E-911. See CIA § 18.
- c. Directory listings and distribution. See CIA § 19.2.
- d. Directory assistance service. See CIA § 19.3.
- e. Yellow page maintenance. See CIA § 19.4.
- f. Transfer of service announcements. See CIA § 17.
- g. Coordinated repair calls. See CIA § 17.2.
- h. Busy line verify and interrupt. See CIA § 7.2.
- i. Information pages. See CIA § 19.5.
- j. Operator reference database. See CIA § 16.

MFS also believes that the Interconnection Order (as defined in the Petition) adopted previously by this Commission supports its position on a number of these issues. Standards should be adopted for interconnection facilities between MFS and other collocated facilities (see, Testimony; Interconnection Order at 50); provision of 911/E911 services (see, § 18.0 of the Interconnection Agreement; see also, Interconnection Order at 28-33); directory assistance (see, Testimony; see also Interconnection Order at 34-35); yellow page maintenance and transfer of service announcements; (see, Testimony; see also, Interconnection Order at 35-37); and for coordinated repair calls and operator reference database (see, Testimony; see also, Interconnection Order at 42-46).

MFS' Position on (Staff's) Issue 14

ISSUE 14:

Should the agreement be approved pursuant to Section 252(e) of the Act?

MFS POSITION:

Yes. Section 252(e)(1) expressly requires that "any interconnection agreement adopted by

negotiation or arbitration shall be submitted for approval to the State commission. A State commission to which an agreement is submitted *shall* approve or reject the agreement, with written findings as to any deficiencies." (Emphasis added.) Section 252(e)(2) provides that an arbitrated agreement must be reviewed against the requirements of section 251, including the FCC regulations prescribed thereunder, and the standards in section 252(d). Section 251 contemplates consideration of the "particular terms and conditions" of agreements necessary to implement that section. See § 251(c)(1).

Respectfully submitted,

Richard M. Rindler (by JRG)

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Dated: September 9, 1996

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of September, 1996 a copy of the foregoing Supplement to Pre-hearing Statement was served, via telecopier and Federal Express to the following:

Michael Billmeier, Esquire
Florida Public Service Commission
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