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Florida Cable Telecommunications Association

Steve Wilkerson, President

October 7, 1996

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. 950737-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") Prehearing Statement. 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 6.1.

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.

Yours very truly,

Laura L. Wilson
Vice President, Regulatory Affairs &
Regulatory Counsel

Enclosures

cc: Mr. Steven E. Wilkerson
All Parties of Record

RECEIVED & FILED

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310 North Monroe Street • Tallahassee, Florida 32301 • (904) 681-1990 FAX (904) 681-9078 10673 OCT-7 96

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STATE
FILE 637

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Temporary)
Local Telephone Number Portability)
Solution to Implement Competition)
in Local Exchange Telephone Markets)
_____)

DOCKET NO. 950737-TP

FILED: October 7, 1996

FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION, INC.'S
PREHEARING STATEMENT

The Florida Cable Telecommunications Association, Inc. ("FCTA") pursuant to Order No. PSC-96-1121-PCO-TP and Rule 25-22.038(3), Florida Administrative Code, respectfully submits the following Prehearing Statement in the above-captioned docket.

WITNESSES/EXHIBITS

FCTA intends to present the direct testimony of Joseph P. Cresse. Mr. Cresse will testify on Issues 1-3. FCTA will sponsor Exhibit JPC-2 attached to Mr. Cresse's direct testimony.

BASIC POSITION

The appropriate cost recovery mechanism for temporary number portability is a "Bill and Keep" approach. It should be remembered that Remote Call Forwarding (RCF) is a technically inferior temporary solution. The temporary nature of RCF is highlighted by the FCC's implementation time line for the permanent number portability solution in Florida. Pursuant to that time line, the seven largest Metropolitan Statistical Areas in Florida will be upgraded for the permanent solution over the next twenty-six months (the order was not stayed pending further disposition).

The temporary nature of the RCF solution weighs in favor of a Bill and Keep approach where local providers do not monetarily compensate each other for the service. The LECs already provide Remote Call Forwarding service to end users today. The incremental cost of providing the

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same Remote Call Forwarding service as a temporary number portability solution is likely to be very small. The incremental costs of doing so are probably much less than the billing and collection costs local providers will incur if they are forced to monetarily compensate each other over. An incremental cost standard, rather than a long run incremental cost standard, is appropriate because RCF is a technically inferior short term solution. The Bill and Keep approach is also fair because all local providers will benefit equally if their customers are able retain their phone numbers. This approach will provide an additional incentive for local providers to cooperate in the many details of implementing a timely permanent number portability solution in Florida. The changes adopted by the Commission should be applied prospectively.

ISSUES AND POSITIONS

FCTA offers the following prehearing positions on the questions of law, fact and public policy identified for disposition in this docket:

ISSUE 1: Is Order No. PSC-95-1604-FOF-TP inconsistent with the Federal Communications Commission's First Report and Order and Further Notice of Proposed Rulemaking in the Matter of Telephone Number Portability in CC Docket No. 95-116?

POSITION: Yes.

ISSUE 2: What is the appropriate cost recovery mechanism for temporary number portability?

POSITION: The Commission should adopt a "Bill and Keep" approach.

ISSUE 3: Should there be any retroactive application of the Commission's decision in this proceeding, if so what should be the effective date?

POSITION: No.

STIPULATIONS

FCTA is aware of no stipulations reached in this docket.

PENDING MOTIONS

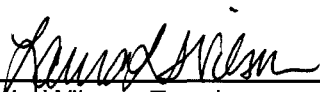
FCTA has no motions pending.

OTHER REQUIREMENTS

FCTA is aware of no requirements of the prehearing order that cannot be met.

RESPECTFULLY SUBMITTED this 7th day of October 7, 1996.

By:



Laura L. Wilson, Esquire
Charles F. Dudley, Esquire
Florida Cable Telecommunications Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301
(904) 681-1990

CERTIFICATE OF SERVICE
DOCKET NO. 950737-TP

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

Hand Delivery(*) and/or U.S. Mail on this 7th day of October, 1996 to the following parties of record:

Monica M. Barone*
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Floyd R. Self
Messer, Vickers, et al.
215 S. Monroe St., Suite 701
Tallahassee, FL 32302

Earl Poucher
Office of Public Counsel
111 W. Madison Street
Suite 812
Tallahassee, FL 32399-1400

William H. Higgins
McCaw Cellular Comm.
c/o Cellular One
250 S. Australian Avenue
West Palm Beach, FL 33401

Clay Phillips
Utilities & Telecommunications
410 House Office Building
Tallahassee, FL 32399

Greg Krasovsky
Commerce & Economic
Opportunities
Senate Office Bldg., Room 426
Tallahassee, FL 32399

Lee L. Willis
J. Jeffry Wahlen
MacFarlane, Ausley et al.,
227 S. Calhoun Street
Tallahassee, FL 32301

Peter M. Dunbar
Robert S. Cohen
Pennington, Culpepper et al.
P.O. Box 10095
215 S. Monroe St., 2nd Floor
Tallahassee, FL 32302-2095

F. B. Poag
Sprint/United Telephone
Company of Florida
555 Lake Border Drive
Apopka, FL 32703

Jill Butler
Florida Regulatory Director
Time Warner Communications
2773 Red Maple Ridge
Tallahassee, FL 32301

Anthony P. Gillman
Kimberly Caswell
GTE Florida, Inc.
P.O. Box 110, FLTC0007
201 N. Franklin Street
Tampa, FL 33601-0110

C. Everett Boyd, Jr.,
Ervin, Varn, Jacobs et al.
305 S. Gadsden Street
P.O. Drawer 1170
Tallahassee, FL 32302

**CERTIFICATE OF SERVICE
DOCKET NO 950737-TP**

Tony H. Key
State Regulatory-South
Sprint
3100 Cumberland Circle
Atlanta, GA 30339

Chan Bryant Abney
Sprint
3100 Cumberland Circle
N0802
Atlanta, Ga 30339

Robert G. Beatty
J. Phillip Carver
c/o Nancy H. Sims
Southern Bell
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301

Richard D. Melson
Hopping Green Sams & Smith
123 S. Calhoun Street
P.O. Box 6526
Tallahassee, FL 32314

Michael W. Tye
AT&T
101 N. Monroe Street
Suite 700
Tallahassee, FL 32301

Robin D. Dunson
1200 Peachtree Street, N.E.
Promenade I, Room 4038
Atlanta, GA 30309

Angela B. Green
Florida Public Telecommunications
Association
125 South Gadsden Street, Suite 200
Tallahassee, FL 32301

Timothy Devine
MFS Communications Co., Inc.
Six Concourse Parkway, Suite 2100
Atlanta, GA 30328

Richard M. Rindler
James C. Falvey
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, FL 32302

Marsha E. Rule
Wiggins & Villacorta, P.A.
BellSouth Mobility, Inc.
Post Office Drawer 1657
Tallahassee, FL 32302

Sue E. Weiske
Senior Counsel
Time Warner Communications
160 Inverness Drive West
Englewood, CO 80112

Martha McMillin
MCI Telecommunications Corp.
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30346

By: 