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October 7, 1996

Ms. Blanca S. Bayó
Director, Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 950737-TP

Dear Ms. Bayó:

On behalf of MCI Telecommunications Corporation and MCImetro Access Transmission Services (MCI) I have enclosed for filing in the above docket the original and 15 copies of MCI's Prehearing Statement, together with a WordPerfect 5.1 disk.

By copy of this letter this document has been provided to the parties on the attached service list.

Very truly yours,

Richard D. Melson

ACK _____
AFA _____
APP _____ RDM/cc
CAF _____ Enclosures
cc: Parties of Record
CMU *Taylor*
CTR _____
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)	
temporary local telephone number)	Docket No. 950737-TP
portability solution to)	
implement competition in local)	Filed: October 7, 1996
exchange telephone markets)	
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MCI'S PREHEARING STATEMENT

MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. (MCI) hereby file their prehearing statement in the above docket.

A. Known Witnesses. MCI has prefiled the direct and rebuttal testimony of Elizabeth G. Kistner. Ms. Kistner will address all issues in this docket.

B. Known Exhibits. MCI has no known exhibits. MCI reserves the right to use exhibits for purposes of cross-examination.

C. Basic Position. The PSC should determine that its previous LNP Order is inconsistent with the FCC Order, in that it established rates for Remote Call Forwarding ("RCF") that are not competitively neutral according to the FCC's cost recovery criteria. The PSC should determine that the costs of number portability should be borne by each carrier providing portability consistent with the competitively neutral requirements of the Telecommunications Act of 1996 and the FCC Order. The PSC should require retroactive application of its order in this proceeding back to the date of the FCC Order and require refunds to ALECs as

appropriate. Last, the PSC should require all LECs and ALECs to adopt appropriate meet-point billing arrangements for access charges paid by interexchange carriers terminating calls via INLP measures.

D.-F. Issues. The following is MCI's position on the issues identified in the order on prehearing procedure.

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?

MCI: Yes. The PSC's LNP Order identified costs associated with providing Remote Call Forwarding ("RCF") and established rates and a cost recovery mechanism. These rates were to be charged to ALECs by BellSouth, GTE Florida ("GTEFL"), and Sprint, for each ALEC number ported from the incumbent LEC via RCF. This approach is inconsistent with the FCC's Order, which requires that ILNP costs be recovered on a competitively neutral basis.

Issue 2. What is the appropriate cost recovery mechanism for temporary number portability?

MCI: The simplest and most direct of the cost recovery mechanisms which meet the FCC criteria is one in which each local carrier would pay for its own costs of currently available number portability measures. This method is superior in that it does not require special reporting between carriers of revenues, minutes of use, number of customer telephone numbers, etc. In addition, it does not require carriers to produce, or the PSC to review, cost studies to determine the appropriate incremental costs for recovery. This is especially important because interim portability measures will soon be replaced by permanent number portability.

Issue 3. Should there be any retroactive application of the Commission's decision in this proceeding? If so, what should be the effective date?

MCI: Yes. The PSC's decision in this case should be retroactively applied to the release date of the FCC Order - July 2, 1996. LECs should pay full refunds to ALECs of all amounts collected for RCF between that date and the date of the PSC's order in this proceeding. Depending on the cost recovery method chosen, the cost of the RCF provided during that period can be reallocated accordingly.

G. Stipulations. MCI is not aware of any stipulations at this time.

H. Pending Motions. MCI has no pending motions at this time.

I. Requirements of Order. MCI believes that it has complied with all requirements of the Order on Procedure.

RESPECTFULLY SUBMITTED this 7th day of October, 1996.

HOPPING GREEN SAMS & SMITH, P.A.

By: 

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by U.S. Mail this 7th day of October, 1996:

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