

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into temporary) Docket No. 950737-TP
local telephone number portability)
solution to implement competition) Filed: 10/7/96
in local exchange telephone markets)
_____)

BELLSOUTH MOBILITY INC'S
PREHEARING STATEMENT

BellSouth Mobility Inc (BMI), pursuant to Order No. PSC-96-1121-PCO-TP, files this prehearing statement.

- A. Witnesses: None
- B. Exhibits: At this time, BMI does not plan to introduce exhibits, but reserves the right to introduce cross-examination exhibits if necessary.
- C. BMI's Basic Position: Number portability among local exchange carriers remains an important precondition for competition. The Stipulation approved by the Commission on September 12, 1995, appropriately indicated that prices for remote call forwarding should be cost based and uniform for each LEC on a per-line per-month basis, with the ALEC price to mirror the LEC price. The Commission should uphold existing negotiated agreements regarding cost recovery for interim number portability.

D. ISSUES

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?

ACK _____
 AFA _____
 APP _____
 CAF _____
 CMU Taylor
 CTR _____
 EAG _____
 LEG 1
 LIN 5
 OPU _____
 RCH _____
 SEC 1
 WAS _____
 OTH _____

BMI's Position: Although the Commission's order appears to be inconsistent with the FCC's Report and Order, BMI continues to support the stipulation signed by parties and approved by the Commission in this docket.

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

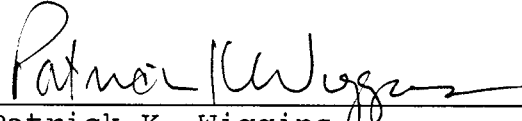
BMI's Position: BMI continues to believe that LEC prices for remote call forwarding should be cost-based. The Commission should uphold existing negotiated agreements regarding cost recovery for interim number portability. BMI has no position on the appropriate cost recovery mechanism in the absence of such agreements.

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

BMI's Position: There should be no retroactive application of any decision in this proceeding. Whatever the effective date of the Commission's order may be, it should not operate to undermine existing agreements previously approved by the Commission.

- E. QUESTIONS OF LAW: None.
- F. POLICY QUESTIONS: None.
- G. STIPULATED ISSUES: None.
- H. PENDING MOTIONS OR OTHER MATTERS: None.
- I. REQUIREMENTS THAT CANNOT BE COMPLIED WITH: None.

Respectfully submitted this 7th day of October, 1996.



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CERTIFICATE OF SERVICE

Docket No. 950737-TP

I HEREBY CERTIFY that a copy of BellSouth Mobility Inc's Prehearing Statement has been furnished this 7th day of October, 1996, to the following:

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