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**AT&T**

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October 7, 1996

Mrs. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Docket No. 950737-TP

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of AT&T's Prehearing Statement.

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Yours truly,

*Michael W. Tye*  
Michael W. Tye

Attachments

cc: Parties of Record

- ACK
- AFA
- APP
- CAF
- ~~OMI~~ Tafa
- CTR
- BAG
- LES   1
- AIN   5
- OPC
- RCM
- SEC   1
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Investigation into	)	DOCKET NO. 950737-TP
temporary local telephone number	)	
portability solution to	)	Filed: October 7, 1996
implement competition in local	)	
exchange telephone markets.	)	
_____	)	

**AT&T'S Prehearing Statement**

AT&T Communications of the Southern States, Inc. (hereinafter "AT&T"), pursuant to Rule 25-22.038, Florida Administrative Code, and order of the Florida Public Service Commission (hereinafter the "Commission") hereby submits its Prehearing Statement in the above-referenced docket.

**A. Witnesses:**

Mike Guedel will testify on behalf of AT&T on all issues.

**B. Exhibits:**

None. However, AT&T reserves the right to present any exhibits that may be necessary to cross-examine opposing witnesses or to respond to matters which are raised for the first time at the hearings in this proceeding.

**C. Basic Position**

The cost recovery method adopted by the Florida Public Service Commission with respect to interim local number portability is not consistent with the Telecommunications Act of 1996 and the FCC's First Report and Order and Further Notice of Rulemaking, released July 2, 1996 ("FCC Order") in CC Docket

No. 95-116. The Commission should adopt a mechanism which requires each carrier to pay for its own costs of providing interim local number portability. In other words, the service should be provided as requested (of either the incumbent or the new entrant) at no charge.

**D. Fact Issues**

See Attachment 1 (AT&T's Positions on Issues).

**E. Legal Issues**

See Attachment 1 (AT&T's Positions on Issues).

**F. Policy Issues**

See Attachment 1 (AT&T's Positions on Issues).

**G. Position on Issues**

See Attachment 1 (AT&T's Positions on Issues).

**H. Stipulated Issues**

None.

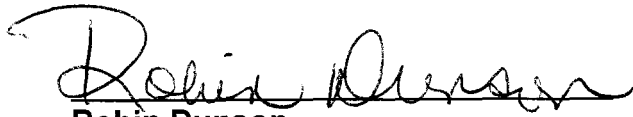
**I. Pending Motions**

None

**J. Other Requirements**

AT&T is not aware of any requirements set forth in the Order on Prehearing Procedure with which it is unable to comply.

**Respectfully submitted** this 7th day of October, 1996.

A handwritten signature in cursive script that reads "Robin Dunson". The signature is written in black ink and is positioned above the typed name.

**Robin Dunson**

**AT&T**

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**Attorney for AT&T Communications  
of the Southern States, Inc.**

## ATTACHMENT 1

### AT&T'S POSITION ON 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?

**AT&T POSITION:** Yes. The FCC concluded that an appropriate charge should be "competitively neutral."

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

**AT&T POSITION:** The Commission should adopt a mechanism which requires each carrier to pay for its own costs of providing interim local number portability. In other words, the service should be provided as requested (of either the incumbent or the new entrant) at no charge.

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

**AT&T POSITION:** No.

**CERTIFICATE OF SERVICE**

**DOCKET NO. 950737-TP**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand-delivery to the following parties of record this 7<sup>th</sup> day of October, 1996:

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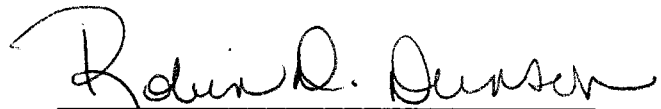
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