LAW OFFICES

MESSER, CAPARELLO, MADSEN, GOLDMAN & METZ

A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701 POST OFFICE BOX 1876 TALLAHASSEE, FLORIDA 32302-1876 TELEPHONE: (904) 222-0720 TELECOPIERS: (904) 224-4359; (904) 425-1942



October 7, 1996

FPSC-RECORDS/REPORTING

BY HAND DELIVERY

Ms. Blanca Bayo, Director Division of Records and Reporting Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

> Docket No. 950737-TP Re:

Dear Ms. Bayo:

Enclosed are an original and fifteen copies of AT&T Wireless Services of Florida, Inc.'s Prehearing Statement in the above-referenced docket.

Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

Thank you for your assistance in this matter.

| ACK | | | |
|---------|--|--|------|
| ٩FA | A STATE OF THE PARTY OF THE PAR | | |
| 1PP | April 10 Thinses All Corporations of State of St | | |
| CAF | FRS/a | mb | |
| nwu | A Enclos | sures | |
| | cc: | William H. Higgins, | Esq. |
| W 1 7 7 | anny area new management of the Sept. | Parties of Record | |
| EAG | Spirit remain all Assessment to profession (Sign) | | |
| LEG | ar ayar garajan a anaan na aadh gag | | |
| | 5 | | |
| 0.00 | No. of Confession States and Confession States (Confession States) | | |
| \$50° | in contract the same speciment of the same same same same same same same sam | The state of the s | , te |

10741 OCT-88

FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In re: Resolution of Petition(s) |) | |
|------------------------------------|---|------------------------|
| to Establish Nondiscriminatory |) | |
| Rates, Terms, and Conditions for |) | Docket No. 950737-TP |
| Interconnection Involving Local |) | Filed: October 7, 1996 |
| Exchange Companies and Alternative |) | |
| Local Exchange Companies Pursuant |) | |
| to Section 364.162, Florida |) | |
| Statutes |) | |
| | | |

PREHEARING STATEMENT OF AT&T WIRELESS SERVICES OF FLORIDA, INC.

AT&T Wireless Services of Florida, Inc. ("AWS"), on behalf of itself and its Florida regional affiliates, pursuant to the requirements of Order No. PSC-96-1121-PCO-TP, respectfully submits its prehearing statement.

APPEARANCES

Floyd R. Self, Esq. and Norman H. Horton, Jr., Esq. Messer, Caparello, Madsen, Goldman & Metz, P.A. Post Office Box 1876
Tallahassee, FL 32302-1876

A. WITNESSES

| Witness | <u>Issues</u> |
|-----------------------|---------------|
| John Giannella-Direct | 1-3 |

B. EXHIBITS

AWS does not intend to present any exhibits, but reserves the right to introduce exhibits, if necessary, as may be required by cross examination, later filed testimony, completion of discovery, or new issues identified at the prehearing conference.



Santa Santa

C. BASIC POSITION

To bring the Florida PSC's interim number portability cost recovery mechanism into compliance with the FCC's First Report and Order in CC Docket No. 96-116, this Commission should require each carrier to recover its own costs. However, regardless of the cost recovery methodology ultimately approved, wireless carriers that do not use interim number portability should not participate in any interim cost recovery mechanism since they will not be porting numbers.

D. ISSUES AND POSITIONS

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?

AWS' POSITION: Y

Yes.

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

AWS' POSITION: Each carrier should pay its own costs. However, regardless of the cost recovery methodology ultimately approved, wireless carriers that do not use interim number portability should not participate in any interim cost recovery mechanism. Nonparticipating carriers should be excluded from any cost recovery mechanism because they are not involved in porting numbers.

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

AWS' POSITION: No position at this time.

E. STIPULATIONS

There have not been any issues stipulated at this time.

F. PENDING MOTIONS

AWS does not have any pending motions.

G. COMPLIANCE WITH OTHER REQUIREMENTS

AWS is unaware of any other requirements of the prehearing order that cannot be complied with.

Dated this 7th day of October, 1996.

Respectfully submitted,

MESSER, CAPARELLO, MADSEN, GOLDMAN & METZ, P.A.

Post Office Box 1876

Tallahassee, FL 32302-1876

(904) 222-07/20

FLOYD R. SELF, ESQ.

NORMAN H. HORTON, JR., ESQ.

Attorneys for AT&T Wireless Services of Florida, Inc. and its Florida regional affiliates

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of AT&T Wireless Services of Florida, Inc.'s Prehearing Statement in Docket No. 950737-TP has been sent by Hand Delivery (*) and/or U.S. Mail on this 7th day of October, 1996 to the following parties of record:

Jack Shreve, Public Counsel Office of the Public Counsel 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400

Monica Barone, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Phillip Carver, Esq.
BellSouth Telecommunications
Suite 1910
150 West Flagler Street
Miami, FL 33130

Laura L. Wilson, Esq. Charles F. Dudley, Esq. Florida Cable Television Assoc. 310 N. Monroe St. Tallahassee, FL 32301

Peter M. Dunbar, Esq. Robert S. Cohen, Esq. Pennington, Culpepper, Moore, Wilkinson, Dunbar and Dunlap, P.A. P.O. Box 10095 Tallahassee, FL 32302

Ms. Jill Butler Florida Regulatory Director Digital Media Partners 2773 Red Maple Ridge Tallahassee, FL 32301

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

Anthony Gillman, Esq. Kimberly Caswell, Esq. GTE Florida, Inc. P.O. Box 110, FLTC0007 Tampa, FL 33601-0110 Robert G. Beatty
BellSouth Telecommunications
c/o Nancy H. Sims
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301

Lee Willis, Esq. Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302

F. Ben Poag Sprint/United Telephone Company of Florida 315 S. Calhoun St., Suite 740 Tallahassee, FL 32301

Timonty Devine MFS Communications Co., Inc. Six Concourse Parway, Suite 2100 Atlanta, GA 30328

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

C. Everett Boyd, Jr. Ervin, Varn, Jacobs, Odom & Ervin P.O. Box 1170 Tallahassee, FL 32302

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

Michael W. Tye, Esq. AT&T 101 N. Monroe St., Ste. 700 Tallahassee, FL 32301

Robin D. Dunson, Esq. 1200 Peachtree St., NE Promenade I, Room 4038 Atlanta, GA 30309 Martha McMillin MCI Telecommunications Corp. 780 Johnson Ferry Road, Suite 700 Atlanta, GA 30346

Richard D. Melson Hopping Boyd Gree & Sams P.O. Box 6526 Tallahassee, FL 32314

Angela B. Green Florida Public Telecommuications Association, Inc. 125 S. Gadsden St., Suite 200 Tallahassee, FL 32301

Patrick K. Wiggins Wiggins & Villacorta, P.A. P.O. Drawer 1657 Tallahassee, FL 32303

Marsha E. Rule Wiggins & Villacorta, P.A. P.O. Drawer 1657 Tallahassee, FL 32303

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

Floyd R Sel