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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the) Docket No. 920260-TL
Revenue Requirements and Rate)
Stabilization Plan of Southern Bell) Filed: 11-21-96
Telephone and Telegraph Company)

INTERMEDIA COMMUNICATIONS INC.'S
POSTHEARING STATEMENT OF ISSUES AND POSITIONS

Intermedia Communications Inc. (Intermedia), hereby files this posthearing statement of issues and positions, pursuant to Rule 25-22.056, Florida Administrative Code and Order No. PSC-95-1421-PCO-TP.

INTRODUCTION

In this post-hearing statement of positions and brief, Intermedia reaffirms without explication its prehearing positions on the various proposals identified within Issue 1. In testimony and documentary evidence, other parties have championed and opposed these proposals, and Intermedia anticipates that these parties will fully brief the advantages and disadvantages of the proposals.

Intermedia does brief Issue 2, however. In response to this issue Intermedia has proposed reductions not addressed by any other party, and it is incumbent upon Intermedia to explain why the record in this docket supports these reductions.

INTERMEDIA'S BASIC POSITION

In determining which reductions to implement, the Commission should attempt to benefit ratepayers generally by promoting competition and ensuring that resulting rates are more cost-based. BellSouth must not be allowed to use these reductions to widen its

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competitive advantage while providing little or no relief for the average ratepayer.

ISSUES: RESTATED POSITIONS AND ARGUMENT:

ISSUE 1: Below are listed the proposals of various interested parties to this proceeding with respect to the disposition of the scheduled 1996 unspecified rate reductions. Which, if any, should be approved?

A) BellSouth:

- 1) Reduce switched access (introduce zone density) (\$16.40 m)**

INTERMEDIA'S POSITION: *Intermedia recommends that the Commission reject this proposal. Although zone density pricing is in theory a more cost-based approach to setting the affected rates, BellSouth's proposal would tend to be anti-competitive.*

- 2) Reduce PBX rates and introduce term contracts (\$13.45M)**

INTERMEDIA'S POSITION: *Reject this proposal as anti-competitive. Provision of PBX trunks is a competitive service and rate reductions here would only enhance BellSouth's competitive advantage. Moreover, Intermedia opposes reduction of PBX rates through term contracts.*

- 3) Waive certain business and residential Secondary Service Order charges (\$5.81m)**

INTERMEDIA'S POSITION:* Intermedia opposes the waiver of these charges because it would promote BellSouth's position in the market by providing a below cost discount to prospective customers and is thus anti-competitive.*

4) Reduce First Line Connection charge (Business) (\$3.22m)

INTERMEDIA'S POSITION: *Intermedia opposes the reduction of these charges. Rather than benefit ratepayers generally, these reductions target business customers to give BellSouth an unnecessary advantage in the market place. Intermedia also opposes those reductions because they do not appear to be cost-based.*

5) Introduce Area Plus for Business (\$2.25m)

INTERMEDIA'S POSITION: *Intermedia opposes this proposal because it would target business customers to give BellSouth an unnecessary advantage in the market place.*

6) Eliminate usage charge on Remote Call Forwarding (\$2.01m)

INTERMEDIA'S POSITION: * Intermedia supports the reduction of the recurring rates for remote call forwarding, but only where such call forwarding is associated with number portability. Facilitating number portability promotes competition and benefits ratepayers generally.*

7) Reduce DID recurring and non-recurring charges (\$1.88m)

INTERMEDIA'S POSITION: *Intermedia opposes this proposal as it would only widen BellSouth's competitive advantage. BellSouth has decided to reduce these rates and charges at this time for the same reason it has proposed PBX rate reductions: to lock out competition.*

8) Credit for ECS routes implemented (\$1.10m)

INTERMEDIA'S POSITION: *Intermedia does not oppose this proposal. The Commission has previously determined the ECS routes in question to be in the public interest.*

9) Reduce Business Line monthly rates in Rate Group 12 (\$0.62m)

INTERMEDIA'S POSITION: *Intermedia opposes this proposal. Intermedia believes that while business rates may need to be reduced, basing the proposed reductions on inappropriate reductions in PBX rates would not promote competition or benefit the public generally.*

10) Reduce Megalink interoffice rates (\$.58m)

INTERMEDIA'S POSITION: *Intermedia supports this proposal. These reductions would bring the rates closer to costs and thus it would be pro-competitive.

11) Reduce WATS and 800 Service access line charges (\$.36m)

INTERMEDIA'S POSITION: *Intermedia opposes reduction of WATS & 800 Service Access Line charges. These reduction would benefit only a small number of customers in a narrow slice of the competitive market. Also, these reductions do not appear to be cost-based.

12) Eliminate the Secondary Service Order charge for WatsSaver (\$0.30m)

INTERMEDIA'S POSITION: *Intermedia does not support the elimination of the Secondary Service Order charge for

WatsSaver. BellSouth is again proposing a rate reduction that is not cost-based and that would not benefit the general body of ratepayers.*

13) Reduce SNAC charges for Business (\$.07m)

INTERMEDIA'S POSITION: *Intermedia supports this proposal. These reductions would bring the rates closer to costs, and is pro-competitive.*

14) Reduce DS-1 interoffice mileage rates (\$48.09m)

INTERMEDIA'S POSITION: *Intermedia supports this proposal, as it would also would bring the rates closer to costs and is pro-competitive.*

B) Joint Proposal of ATT, MCI, Sprint Communications, FIXCA, Ad Hoc and McCaw Communications:

1) Reduce PBX and DID trunk charges (\$11.00m)

INTERMEDIA'S POSITION: *Intermedia opposes this proposal. The restructure of PBX rates and the elimination or reduction of NRCs provide little or no relief for the average rate payer and only improve BellSouth's competitive advantage.*

2) Eliminate the Residual Interconnection Charge (\$35.00m)

INTERMEDIA'S POSITION: Intermedia does not oppose elimination of the RIC. Intermedia is concerned, however, that if the RIC is entirely eliminated, the lion's share of the available revenues will have been used to reduce access charges. As a

matter of policy, the Commission might choose to use some of that \$35 million elsewhere.*

3) Reduce mobile interconnection rates (\$2.00m)

INTERMEDIA'S POSITION: *Intermedia does not oppose this proposal. This proposal would bring mobile interconnection usage rates closer to cost, which is pro-competitive.*

C) Public Counsel:

Establish a reserve fund to assist BST customers who have experienced problems with conversion to the 954 NPA.

INTERMEDIA'S POSITION: *Intermedia does not oppose this proposal.*

D) FCTA:

Eliminate nonrecurring charges for interconnection trunks and special access circuits ordered by ALECs.

INTERMEDIA'S POSITION: *Intermedia supports this proposal. These reductions would facilitate interconnection and thus would promote competition.*

E) Palm Beach Newspapers, Inc./Florida Today:

Reduce usage rates for N11 service to \$.02 per minute.

INTERMEDIA'S POSITION: *Intermedia does not oppose this proposal.*

ISSUE 2: To the extent the Commission does not approve the plans proposed by BellSouth, Public Counsel, FCTA, Palm Beach Newspapers, Inc./Florida Today and AT&T, MCI, Sprint, FIXCA, AD Hoc and McCaw, how should the Commission implement the scheduled rate reduction?

INTERMEDIA'S POSITION: * The Commission should also reduce the local channel for (a) LightGate, Megalink and SynchroNet services and (b) the corresponding High Capacity Service and Digital Data Access Service services. *

ARGUMENT

The Commission should reduce the local channel for LightGate, MegaLink and SynchroNet services and the corresponding High Capacity Service and Digital Data Access Service services. Moreover, where the local channel element is distance sensitive, the Commission should require a flat-rated local channel rate. Although this proposal has not been advanced by any other party, yet would be an important pro-competitive, cost-based use of the available funds.

In Issue 1A(10), BellSouth proposes reduction of Megalink inter-office rates. BellSouth proposes and Intermedia supports these reductions for the same reason: they would bring the rates closer to costs and thus would be more pro-competitive. Unfortunately, BellSouth focuses only on the inter-office channel component of one service, Megalink, while ignoring the local channel element of that service and of LightGate and SynchroNet, which are similar. The Commission should take this opportunity to further promote competition by requiring BellSouth (a) to price the local channel elements for these three services closer to costs and (b) to adopt a flat rate for the local channel element.

Currently there are five services that are more or less comparable in the market and should be priced consistently to avoid distortion in the markets. These services are Analog Private Line

for both voice and data; Digital Network Service Megalink; SynchroNet Digital Local Channel service; and the HICAP DS-1 Special Access Service.

Table 1 below compares the revenue requirement and the present rate and the rate structure for the local channel elements of these five services based on the MFRS filed in this docket. The referenced MFRS are attached to this brief as an appendix. Of particular interest is that for the analog private line, the difference between the revenue requirement and the present rate is roughly five percent. In other words, the present rate is roughly 105 percent of the revenue requirement. Thus, a one mile local channel for an analog voice private line costs \$21.15 on a distance-sensitive basis.

Local channel for digital services is priced much higher however. For example a local channel link of one mile for Megalink has a revenue requirement of \$85.12 and a price of \$140.90, for a difference of \$55.78. In other words, the price is an amount equal to 165 percent of the cost. For Megalink the local channel is a distance-sensitive charge based on each half mile.

The HICAP DS-1 Local Channel for special access is not priced on a distance-sensitive basis, but rather is flat-rated. The cost for a 1 mile local channel element is \$83.46, the present rate of \$137.80 with a difference being \$54.34. Again, the present rate represents roughly 155 percent of its revenue requirement.

Intermedia recommends that all local channel elements be flat-rated and that they be priced more closely to cost. Intermedia

proposes that the rate for the local channel element of these services be set at 105 percent of their respective revenue requirements as reflected in the MFRs filed in this case. These new rates would be in the public interest because they would result in comparable services being comparably priced and because they would promote competition in local markets.

INTERMEDIA COMMUNICATIONS INC.
LOCAL CHANNEL RATE COMPARISON

Service	Rev Req	Present Rate	Difference	Flat or Distance?
Analog PL voice local channel (1 mile) ¹	20.10	21.15	1.05	Distance (per mile)
Analog data local channel (1 mile) ²	30.10	31.65	1.55	Distance (per mile)
Digital Network Service Megalink (1 mile) ³	85.12	140.90	55.78	Distance (per half mile)
Synchronet Dig. Loca Channel 2.4, 4.8, 9.6 or 19.2 KBPS ⁴	36.07	49.35	13.28	Flat
Spec. Access HICAP DS-1 Local Channel ⁵	83.46	137.80	54.34	Flat

¹MFR Schedule E-1a page 878 of 1040 Line 4; Tariff B3/8.2.3.

²MFR Schedule E-1a page 878 of 1040 Line 20; Tariff B3/8.2.3.

³MFR Schedule E-1a page 892 of 1040, Lines 2 & 3; Tariff B7.1.3.


⁴MFR Schedule E-1a Page 894 of 1040, Lines 2-5; Tariff B7/B7-2-3.

⁵MFR Schedule E-1a page 1004 of 1040, Line 3; Tariff E7/36 # 7-5-6.

ISSUE 3: What should be the effective dates of the approved tariffs?

INTERMEDIA'S POSITION: No position.

Respectfully submitted this 21st day of November 1996.


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APPENDIX

ANALOG

Present and Proposed Rates and Revenues
 8003 RESTRUCTURED PRIVATE LINE

RECURRING RATES

Line No.	Tariff Section/ Page or Source Ident.	Tariff Code	Service Description	Revenue R'qment* If Known	Type of Cost STD. Use	Average Billing Units	Pres. Rate	Prop. Rate	\$ Incr. (Decr.)	% Incr. (Decr.)	Annual Pres. Rev.	Annual Prop. Rev.	Annual Rev. Change	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	
1		B3.4.1	PL VOICE LOCAL CHANNEL											
2	B3/8.2.3	P2JUX	PR TERM -1ST - TYPE 2230	16.93		11,845	\$21.15	\$21.15	\$0.00	0.00%	\$3,006,261	\$3,006,261	\$0	
3	B3/8.2.3	P2JUX	PR TERM -ADDL - TYPE 2230	16.93		0	\$21.15	\$21.15	\$0.00	0.00%	\$0	\$0	\$0	
4	B3/8.2.3	P2JHX	PR TERM -1ST - TYPE 2231	20.10		24,777	\$21.15	\$21.15	\$0.00	0.00%	\$6,288,403	\$6,288,403	\$0	
5	B3/8.2.3	P2JHX	PR TERM -ADDL - TYPE 2231	20.10		0	\$21.15	\$21.15	\$0.00	0.00%	\$0	\$0	\$0	
6	B3/8.2.3	P2JQX	PR TERM -1ST - TYPE 2432	30.45		2,986	\$31.90	\$31.90	\$0.00	0.00%	\$1,143,041	\$1,143,041	\$0	
7	B3/8.2.3	P2JQX	PR TERM -ADDL - TYPE 2432	30.45		0	\$31.90	\$31.90	\$0.00	0.00%	\$0	\$0	\$0	
8	B3/8.2.3	P2JGX	PR TERM -1ST - TYPE 2434	2.77		2,660	\$2.95	\$2.95	\$0.00	0.00%	\$94,164	\$94,164	\$0	
9	B3/8.2.3	P2JGX	PR TERM -ADDL - TYPE 2434	2.77		0	\$2.95	\$2.95	\$0.00	0.00%	\$0	\$0	\$0	
10	B3/8.2.3	P2JWX	PR TERM -1ST - TYPE 2435	26.49		619	\$31.90	\$31.90	\$0.00	0.00%	\$236,953	\$236,953	\$0	
11	B3/8.2.3	P2JWX	PR TERM -ADDL - TYPE 2435	26.49		0	\$31.90	\$31.90	\$0.00	0.00%	\$0	\$0	\$0	
12	B3/8.2.3	P2JLX	PR TERM -1ST - TYPE 2261	26.25		3,798	\$27.55	\$27.55	\$0.00	0.00%	\$1,255,619	\$1,255,619	\$0	
13	B3/8.2.3	P2JLX	PR TERM -ADDL - TYPE 2261	26.25		0	\$27.55	\$27.55	\$0.00	0.00%	\$0	\$0	\$0	
14	B3/8.2.3	P2JRX	PR TERM -1ST - TYPE 2462	35.97		269	\$37.75	\$37.75	\$0.00	0.00%	\$121,857	\$121,857	\$0	
15	B3/8.2.3	P2JRX	PR TERM -ADDL - TYPE 2462	35.97		0	\$37.75	\$37.75	\$0.00	0.00%	\$0	\$0	\$0	
16		B3.4.1	PL VOICE LOCAL CHANNEL								SUB-TOTAL	\$12,146,298	\$12,146,298	\$0
17		B3.4.1	PL DATA LOCAL CHANNEL											
18	B3/8.2.3	P2JKX	PR TERM- 1ST - TYPE 2260	24.27		530	\$25.45	\$25.45	\$0.00	0.00%	\$161,862	\$161,862	\$0	
19	B3/8.2.3	P2JKX	PR TERM- ADDL - TYPE 2260	24.27		0	\$25.45	\$25.45	\$0.00	0.00%	\$0	\$0	\$0	
20	B3/8.2.3	P2JMX	PR TERM- 1ST - TYPE 2463	30.10		18,190	\$31.65	\$31.65	\$0.00	0.00%	\$6,908,562	\$6,908,562	\$0	
21	B3/8.2.3	P2JMX	PR TERM- ADDL - TYPE 2463	30.10		0	\$31.65	\$31.65	\$0.00	0.00%	\$0	\$0	\$0	
22	B3/8.2.3	P2JNX	PR TERM- 1ST - TYPE 2464	29.70		1,092	\$31.65	\$31.65	\$0.00	0.00%	\$414,742	\$414,742	\$0	

* Unless otherwise specified, the revenue requirement is based on incremental/resource cost.

ANNEX

Present and Proposed Rates and Revenues
 8003 RESTRUCTURED PRIVATE LINE

RECURRING RATES

Line No.	Tariff Section/ Page or Source Ident.	Tariff Code	Service Description	Revenue R'qment* If Known	Type of Cost STD. Use	Average Billing Units	Pres. Rate	Prop. Rate	\$ Incr. (Decr.)	% Incr. (Decr.)	Annual Pres. Rev.	Annual Prop. Rev.	Annual Rev. Change
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	
1	B3/8.2.3	P2JNX	PR TERM- ADDL- TYPE 2464	29.70		0	\$31.65	\$31.65	\$0.00	0.00%	\$0	\$0	\$0
2		B3.4.1	PL DATA LOCAL CHANNEL								\$7,485,166	\$7,485,166	\$0
3		B3.4.2	PL SERVED DIRECT										
4	B3/8.2.3	SDD2X	PR TERM- ADDL2000-1ST			5,024	\$8.50	\$8.50	\$0.00	0.00%	\$512,448	\$512,448	\$0
5	B3/8.2.3	SDD2X	PR TERM- ADDL2000-ADDL			0	\$8.50	\$8.50	\$0.00	0.00%	\$0	\$0	\$0
6		B3.4.2	PL SERVED DIRECT								\$512,448	\$512,448	\$0
7		B3.4.3	PL VOICE INTEROFFICE										
8	B3/8.2.4	3LBBS	1 THRU 8 MILES - FIXED	27.09		8,754	\$28.50	\$28.50	\$0.00	0.00%	\$2,993,868	\$2,993,868	\$0
9	B3/8.2.4	3LBBS	1 THRU 8 MILES - PER MI	0.63		41,397	\$1.65	\$1.65	\$0.00	0.00%	\$819,661	\$819,661	\$0
10	B3/8.2.4	3LBBS	9 THRU 25 MILES- FIXED	27.09		5,706	\$28.50	\$28.50	\$0.00	0.00%	\$1,951,452	\$1,951,452	\$0
11	B3/8.2.4	3LBBS	9 THRU 25 MILES- PER MI	0.56		69,508	\$1.60	\$1.60	\$0.00	0.00%	\$1,334,554	\$1,334,554	\$0
12	B3/8.2.4	3LBBS	OVER 25 MILES - FIXED	27.09		1,847	\$28.50	\$28.50	\$0.00	0.00%	\$631,674	\$631,674	\$0
13	B3/8.2.4	3LBBS	OVER 25 MILES - PER MI	0.53		75,217	\$1.55	\$1.55	\$0.00	0.00%	\$1,399,036	\$1,399,036	\$0
14		B3.4.3	PL VOICE INTEROFFICE								\$9,130,245	\$9,130,245	\$0
15		B3.4.4	PL BRIDGING										
16	B3/8.2.5	BQ9	VOICE BRDG- PER 2W PORT	3.41		988	\$3.95	\$3.95	\$0.00	0.00%	\$46,831	\$46,831	\$0
17	B3/8.2.5	BQ9	VOICE BRDG- PER 4W PORT	3.41		68	\$3.95	\$3.95	\$0.00	0.00%	\$3,223	\$3,223	\$0
18	B3/8.2.5	BQ9	DATA BRDG - PER 4W PORT	5.83		9,106	\$6.70	\$6.70	\$0.00	0.00%	\$732,122	\$732,122	\$0
19		B3.4.4	PL BRIDGING								\$782,176	\$782,176	\$0

* Unless otherwise specified, the revenue requirement is based on incremental/resource cost.

Present and Proposed Rates and Revenues
 8007 DIGITAL NETWORK SERVICE

RECURRING RATES

Line No.	Tariff Section/ Page or Source Ident.	Tariff Code	Service Description	Revenue R'qment* If Known	Type of Cost STD. Use	Average Billing Units	Pres. Rate	Prop. Rate	\$ Incr. (Decr.)	% Incr. (Decr.)	Annual Pres. Rev.	Annual Prop. Rev.	Annual Rev. Change	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	
1		B7.1.3	MEGALINK SERVICE - RECURRING M TO M											
2	B7/5	1LDPZ	DLC- TST 1/2 MI	70.88		1,634	\$96.90	\$96.90	\$0.00	0.00%	\$1,900,015	\$1,900,015	\$0	
3	B7/5	1LDPA	DLC- ADD 1/2 MI	14.24		4,745	\$44.00	\$44.00	\$0.00	0.00%	\$2,505,360	\$2,505,360	\$0	
4	B7/5	1LNO1	PER CHAN 0-8 MILES	41.64		334	\$64.35	\$64.35	\$0.00	0.00%	\$257,915	\$257,915	\$0	
5	B7/5	1LNOA	PER CHAN-EACH ADD'L MI	5.23		1,677	\$29.80	\$29.80	\$0.00	0.00%	\$599,695	\$599,695	\$0	
6	B7/5.0.1	1LNO2	PER CHAN 9-25 MILES	41.64		162	\$64.35	\$64.35	\$0.00	0.00%	\$125,096	\$125,096	\$0	
7	B7/5.0.1	1LNOB	PER CHAN-EACH ADD'L MI	2.62		2,308	\$27.95	\$27.95	\$0.00	0.00%	\$774,103	\$774,103	\$0	
8	B7/5.0.1	1LNO3	PER CHAN OVER 25 MILES	41.64		50	\$64.35	\$64.35	\$0.00	0.00%	\$38,610	\$38,610	\$0	
9	B7/5.0.1	1LNOC	PER CHAN-EACH ADD'L MI	1.90		2,171	\$26.10	\$26.10	\$0.00	0.00%	\$679,957	\$679,957	\$0	
10		B7.1.3	MEGALINK SERVICE - RECURRING M TO M								SUB-TOTAL	\$6,880,751	\$6,880,751	\$0
11		B7.1.3	MEGALINK SERVICE - RECURRING 24-48M											
12	B7/5	1LDPZ	DLC- 1ST 1/2 MI	70.88		954	\$95.05	\$95.05	\$0.00	0.00%	\$1,088,132	\$1,088,132	\$0	
13	B7/5	1LDPA	DLC- ADD 1/2 MI	14.24		2,423	\$43.00	\$43.00	\$0.00	0.00%	\$1,250,268	\$1,250,268	\$0	
14	B7/5	1LNO1	PER CHAN 0-8 MILES	41.64		222	\$59.75	\$59.75	\$0.00	0.00%	\$159,174	\$159,174	\$0	
15	B7/5	1LNOA	PER CHAN-EACH ADD'L MI	5.23		1,156	\$24.25	\$24.25	\$0.00	0.00%	\$336,396	\$336,396	\$0	
16	B7/5.0.1	1LNO2	PER CHAN 9-25 MILES	41.64		171	\$59.75	\$59.75	\$0.00	0.00%	\$122,607	\$122,607	\$0	
17	B7/5.0.1	1LNOB	PER CHAN-EACH ADD'L MI	2.62		2,442	\$22.35	\$22.35	\$0.00	0.00%	\$654,944	\$654,944	\$0	
18	B7/5.0.1	1LNO3	PER CHAN OVER 25 MILES	41.64		58	\$59.75	\$59.75	\$0.00	0.00%	\$41,586	\$41,586	\$0	
19	B7/5.0.1	1LNOC	PER CHAN-EACH ADD'L MI	1.90		2,113	\$20.50	\$20.50	\$0.00	0.00%	\$519,798	\$519,798	\$0	
20		B7.1.3	MEGALINK SERVICE - RECURRING 24-48M								SUB-TOTAL	\$4,172,905	\$4,172,905	\$0

* Unless otherwise specified, the revenue requirement is based on incremental/resource cost.

Present and Proposed Rates and Revenues
 8007 DIGITAL NETWORK SERVICE

RECURRING RATES														
Line No.	Tariff Section/ Page or Source Ident.	Tariff Code	Service Description	Revenue R'qment* If Known	Type of STD. Use	Average Billing Units	Pres. Rate	Prop. Rate	\$ Incr. (Decr.)	% Incr. (Decr.)	Annual Pres. Rev.	Annual Prop. Rev.	Annual Rev. Change	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	
1		B7.2.3	<u>SYNCRONET DIGITAL LOCAL CHAN - MTOM</u>											
2	B7/11	1RSD2	2.4 KBPS - FIRST	36.07		49	\$49.35	\$49.35	\$0.00	0.00%	\$29,018	\$29,018	\$0	
3	B7/11	1RSD4	4.8 KBPS - FIRST	36.07		151	\$49.35	\$49.35	\$0.00	0.00%	\$89,422	\$89,422	\$0	
4	B7/11	1RSD9	9.6 KBPS - FIRST	36.07		3,312	\$49.35	\$49.35	\$0.00	0.00%	\$1,961,366	\$1,961,366	\$0	
5	B7/11	1RSD3	19.2KBPS - FIRST	36.07		112	\$49.35	\$49.35	\$0.00	0.00%	\$66,326	\$66,326	\$0	
6	B7/11	1RSD5	56.0 KBPS - FIRST	44.31		1,509	\$69.10	\$69.10	\$0.00	0.00%	\$1,251,263	\$1,251,263	\$0	
7	B7/11	1RSD6	64.0 KBPS - FIRST	44.31		4	\$69.10	\$69.10	\$0.00	0.00%	\$3,317	\$3,317	\$0	
8		B7.2.3	SYNCRONET DIGITAL LOCAL CHAN - MTOM								SUB-TOTAL	\$3,400,712	\$3,400,712	\$0
9		B7.2.3	SYNCRONET DIGITAL LOCAL CHAN - 24-42M											
10	B7/11	1RSD2	2.4 KBPS	36.07		16	\$47.00	\$47.00	\$0.00	0.00%	\$9,024	\$9,024	\$0	
11	B7/11	1RSD4	4.8 KBPS	36.07		9	\$47.00	\$47.00	\$0.00	0.00%	\$5,076	\$5,076	\$0	
12	B7/11	1RSD9	9.6 KBPS	36.07		498	\$47.00	\$47.00	\$0.00	0.00%	\$280,872	\$280,872	\$0	
13	B7/11	1RSD3	19.2KBPS	36.07		269	\$47.00	\$47.00	\$0.00	0.00%	\$151,716	\$151,716	\$0	
14	B7/11	1RSD5	56.0 KBPS	44.31		430	\$62.00	\$62.00	\$0.00	0.00%	\$319,920	\$319,920	\$0	
15	B7/11	1RSD6	64.0 KBPS	44.31		0	\$62.00	\$62.00	\$0.00	0.00%	\$0	\$0	\$0	
16		B7.2.3	SYNCRONET DIGITAL LOCAL CHAN - 24-42M								SUB-TOTAL	\$766,608	\$766,608	\$0
17		B7.2.3	SYNCRONET DIGITAL LOCAL CHAN - 43-60M											
18	B7/11	1RSD2	2.4 KBPS	36.07		116	\$44.50	\$44.50	\$0.00	0.00%	\$61,944	\$61,944	\$0	
19	B7/11	1RSD4	4.8 KBPS	36.07		179	\$44.50	\$44.50	\$0.00	0.00%	\$95,586	\$95,586	\$0	
20	B7/11	1RSD9	9.6 KBPS	36.07		1,112	\$44.50	\$44.50	\$0.00	0.00%	\$593,808	\$593,808	\$0	
21	B7/11	1RSD3	19.2KBPS	36.07		191	\$44.50	\$44.50	\$0.00	0.00%	\$101,994	\$101,994	\$0	

* Unless otherwise specified, the revenue requirement is based on incremental/resource cost.

Present and Proposed Rates and Revenues
 E007 SPECIAL ACCESS SERVICE

RECURRING RATES

Line No.	Tariff Section/ Page or Source Ident.	Tariff Code	Service Description	Revenue R'qment* If Known	Type of Cost STD. Use	Average Billing Units	Pres. Rate	Prop. Rate	\$ Incr. (Decr.)	% Incr. (Decr.)	Annual Pres. Rev.	Annual Prop. Rev.	Annual Rev. Change	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)		
1	E7/32	XSSLC	SIGNAL CAPA. -TP C- INIT	2.11		112	\$2.10	\$2.10	\$0.00	0.00%	\$2,812	\$2,812	\$0	
2	E7/32	XSS++	SIGNAL CAPA. -OTH - INIT	4.96		98	\$4.60	\$4.60	\$0.00	0.00%	\$5,433	\$5,433	\$0	
3	E7/32.1	UGD	IMPROV TRM/PT TRM- INIT	1.87		51	\$1.60	\$1.60	\$0.00	0.00%	\$984	\$984	\$0	
4		E7.5.3	VOICE GRADE LOCAL CHAN- OPT. FEATURES								SUB-TOTAL	\$519,069	\$519,069	\$0
5		E7.5.5	DDAS LOC CHAN - M TO M											
6	E7/32.1	T6ECS	PER TERM - 2.4KBPS 1ST	36.07		190	\$36.30	\$36.30	\$0.00	0.00%	\$82,619	\$82,619	\$0	
7	E7/32.1	T6ECS	- 4.8KBPS 1ST	36.07		43	\$36.30	\$36.30	\$0.00	0.00%	\$18,731	\$18,731	\$0	
8	E7/32.1	T6ECS	- 9.6KBPS 1ST	36.07		620	\$36.30	\$36.30	\$0.00	0.00%	\$270,181	\$270,181	\$0	
9	E7/32.1	T6ECS	- 19.2KBPS 1ST	36.07		58	\$36.30	\$36.30	\$0.00	0.00%	\$25,192	\$25,192	\$0	
10	E7/32.1	T6ECS	- 56 KBPS 1ST	44.31		565	\$50.80	\$50.80	\$0.00	0.00%	\$344,424	\$344,424	\$0	
11	E7/32.1	T6ECS	- 64 KBPS 1ST	44.31		0	\$50.80	\$50.80	\$0.00	0.00%	\$0	\$0	\$0	
12		E7.5.5	DDAS LOC CHAN - M TO M								SUB-TOTAL	\$741,147	\$741,147	\$0
13		E7.5.5	DDAS HUB TERMINATION - M TO M											
14	E7/33	TUTA4	PER TERM - 2.4KBPS 1ST	5.58		171	\$7.30	\$7.30	\$0.00	0.00%	\$14,936	\$14,936	\$0	
15	E7/33	TUTB4	- 4.8KBPS 1ST	5.58		33	\$7.30	\$7.30	\$0.00	0.00%	\$2,898	\$2,898	\$0	
16	E7/33	TUTC4	- 9.6KBPS 1ST	5.58		434	\$7.30	\$7.30	\$0.00	0.00%	\$38,048	\$38,048	\$0	
17	E7/33	TUTE4	- 19.2KBPS 1ST	5.91		35	\$7.30	\$7.30	\$0.00	0.00%	\$3,037	\$3,037	\$0	
18	E7/33	TUTD4	- 56 KBPS 1ST	7.01		288	\$21.80	\$21.80	\$0.00	0.00%	\$75,254	\$75,254	\$0	
19	E7/33	TUTF4	- 64 KBPS 1ST	7.01		0	\$21.80	\$21.80	\$0.00	0.00%	\$0	\$0	\$0	
20		E7.5.5	DDAS HUB TERMINATION - M TO M								SUB-TOTAL	\$134,173	\$134,173	\$0

* Unless otherwise specified, the revenue requirement used is based on incremental/resource cost.

Present and Proposed Rates and Revenues
 E007 SPECIAL ACCESS SERVICE

RECURRING RATES													
Line No.	Tariff Section/ Page or Source Ident.	Tariff Code	Service Description	Revenue R'qment* If Known	Type of Cost STD.	Average Billing Units	Pres. Rate	Prop. Rate	\$ Incr. (Decr.)	% Incr. (Decr.)	Annual Pres. Rev.	Annual Prop. Rev.	Annual Rev. Change
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	
1		E7.5.5	DDAS BRIDGING/SEC CHAN								\$66,176	\$66,176	\$0
2		<u>E7.5.6</u>	<u>HICAP DS1 LOC CHAN</u>										
3	E7/36	TMECS	DS1 LOC CHAN-PR TRM-1ST	83.46		1,082	\$137.80	\$137.80	\$0.00	0.00%	\$1,789,746	\$1,789,746	\$0
4	E7/37	TMECS	-24 - 48 M	83.46		0	\$138.05	\$138.05	\$0.00	0.00%	\$0	\$0	\$0
5	E7/37	TMECS	-49 - 72 M	83.46		0	\$136.05	\$136.05	\$0.00	0.00%	\$0	\$0	\$0
6	E7/37	TMECS	-73 - 96 M	83.46		0	\$134.05	\$134.05	\$0.00	0.00%	\$0	\$0	\$0
7		E7.5.6	HICAP DS1 LOC CHAN								\$1,789,746	\$1,789,746	\$0
8		E7.5.6	HICAP DS1 MILEAGE - M TO M										
9	E7/37	1L5TC	HICAP (64kb) IOC -CKT -0 MI			12	\$2.20	\$2.20	\$0.00	0.00%	\$317	\$317	\$0
10	E7/37	1L5XX	DS1 - ICO -CKT -1-8 MI	41.64		186	\$55.00	\$55.00	\$0.00	0.00%	\$122,595	\$122,595	\$0
11	E7/37	1L5XX	-IOM -1-8 MI	5.23		896	\$29.00	\$29.00	\$0.00	0.00%	\$311,779	\$311,779	\$0
12	E7/37	1L5XX	-CKT -9-25 MI	41.64		91	\$55.00	\$55.00	\$0.00	0.00%	\$59,950	\$59,950	\$0
13	E7/37	1L5XX	-IOM -9-25 MI	2.62		1,095	\$27.50	\$27.50	\$0.00	0.00%	\$361,240	\$361,240	\$0
14	E7/37	1L5XX	-CKT -25+ MI	41.64		14	\$55.00	\$55.00	\$0.00	0.00%	\$9,515	\$9,515	\$0
15	E7/37	1L5XX	-IOM 25+ MI	1.90		652	\$26.00	\$26.00	\$0.00	0.00%	\$203,424	\$203,424	\$0
16		E7.5.6	HICAP DS1 MILEAGE - M TO M								\$1,068,820	\$1,068,820	\$0
17		E7.5.6	HICAP DS1 MILEAGE - 24 - 48M										
18	E7/37	1L5XX	DS1 - ICO -CKT -1-8 MI	41.64		0	\$59.75	\$59.75	\$0.00	0.00%	\$0	\$0	\$0
19	E7/37	1L5XX	-IOM -1-8 MI	5.23		0	\$24.25	\$24.25	\$0.00	0.00%	\$0	\$0	\$0
20	E7/37	1L5XX	-CKT -9-25 MI	41.64		0	\$59.75	\$59.75	\$0.00	0.00%	\$0	\$0	\$0
21	E7/37	1L5XX	-IOM -9-25 MI	2.62		0	\$22.35	\$22.35	\$0.00	0.00%	\$0	\$0	\$0

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CERTIFICATE OF SERVICE

Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing Post Hearing Brief of Intermedia Communications Inc. has been furnished by United States Mail this 21st day of November, 1996, to:

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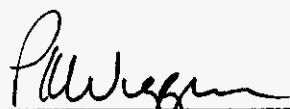
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