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GTE Telephone Operations

Marceil Morrell**
Vice President & General Counsel - Florida

Associate General Counsel
Anthony P. Gillman**
Leslie Reicin Stein*

Attorneys*
Kimberly Caswell
M. Eric Edgington
Ernesto Mayor, Jr.

One Tampa City Center
201 North Franklin Street, FLTC0007
Post Office Box 110
Tampa, Florida 33601
813-483-2606
813-204-8870 (Facsimile)

* Licensed in Florida
** Certified in Florida as Authorized House Counsel

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

March 6, 1997

Re: Docket Nos. 960847-TP and 960980-TP
Petitions by AT&T Communications of the Southern States, Inc., MCI
Telecommunications Corporation and MCI Metro Access Transmission
Services, Inc. for arbitration of certain terms and conditions of a proposed
agreement with GTE Florida Incorporated concerning interconnection and
resale under the Telecommunications Act of 1996

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of GTE Florida
Incorporated's Request for Extension to File AIN Capabilities Cost Study in the above
ACK _____ matters. Service has been made as indicated on the Certificate of Service. If there are
AFA _____ any questions regarding this filing, please contact me at (813) 483-2617.

APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG _____
LIN _____
OPC _____
RCH _____
SEC _____
WAS _____
OTH _____

Very truly yours,

Kimberly P. Caswell

Kimberly Caswell

KC:tas

5 Enclosures

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A part of GTE Corporation

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T Communications)	Docket No. 960847-TP
of the Southern States, Inc., MCI)	Docket No. 960980-TP
Telecommunications Corporation and MCI)	Filed: March 6, 1997
Metro Access Transmission Services, Inc.,)	
for arbitration of certain terms and)	
conditions of a proposed agreement with)	
GTE Florida Incorporated concerning)	
interconnection and resale under the)	
Telecommunications Act of 1996)	
_____)	

GTE FLORIDA INCORPORATED'S REQUEST FOR EXTENSION TO FILE AIN CAPABILITIES COST STUDY

In its Order number PSC-97-0064-FOF-TP (Order) in this docket, the Commission directed GTE Florida Incorporated (GTEFL) to file total service long-run incremental cost studies for a number of network elements not covered by the cost studies GTEFL submitted at the beginning of this arbitration. Among those elements, the Commission listed "AIN capabilities." These cost studies are due on March 18, 1997. (Order at 34.) For the reasons discussed below, GTEFL asks the Commission for a 90-day extension within which to file the AIN cost study.

First, it has been difficult for GTEFL to determine what the AIN cost study should include. Because the term "AIN capabilities" is not specific enough to design a meaningful and relevant study, there has necessarily been some delay in discerning the proper scope of the cost analysis. Commission Staff has advised GTEFL that the study should include the AIN capabilities AT&T has requested, but neither AT&T nor MCI have described in sufficient detail the capabilities they seek.

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Also, because AIN allows development of new services, the AIN cost could vary substantially depending upon the new service. This creates additional challenges in identifying cost components and in structuring cost studies which capture the variables. Nevertheless, GTEFL is evaluating methods to access AIN and is defining the certification and testing programs for carriers that request such access.

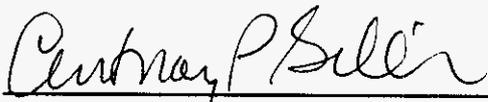
Second, GTEFL has discovered some problems in its existing cost data for AIN features. GTEFL had planned to build the Commission-required study from these inputs, but they will need to be revised substantially to produce an accurate study. Because of the many other cost studies GTE must do in connection with arbitration proceedings in Florida and numerous other states, GTE's personnel and other resources continue to be severely taxed. The unexpected problems with the AIN cost inputs have made this already bad resource situation even worse, so that GTEFL cannot realistically complete a thorough and reliable study within the Order's time frame.

Third, no party will be prejudiced by the Commission's granting the extension GTEFL has requested. Pursuant to the Order, GTEFL has already submitted for approval its interconnection and unbundling contracts with AT&T and MCI, respectively. The contract with AT&T contained no issues regarding AIN capabilities. In MCI's contract, Appendix C does list AIN capabilities, but with rates TBD ("to be determined"), contemplating that the study would not be done before the contract was approved. Furthermore, the contract does not define AIN capabilities. For these reasons, lack of the AIN cost study will have no effect on the ability of the Commission to approve the contracts or the ability of MCI and AT&T to operate under them. Because it appears that neither

AT&T nor MCI will be using the "AIN capabilities" in the immediate future, a 90-day delay in completing the AIN cost study will in no way undermine this Commission's mission to foster competition.

For all the reasons discussed in this filing, GTEFL asks the Commission to grant it a 90-day extension to complete the AIN capabilities cost study required in the Order.

Respectfully submitted on March 6, 1997.

By: 
Kimberly Caswell
Anthony P. Gillman
Post Office Box 110, FLTC0007
Tampa, Florida 33601
Telephone: 813-483-2617

Attorneys for GTE Florida Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of GTE Florida Incorporated's Request for Extension to File AIN Capabilities Cost Study in Docket Nos. 960847-TP and 960980-TP was sent via U.S. mail on March 6, 1997 to the parties listed below.

Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Tracy Hatch/Michael W. Tye
AT&T
101 North Monroe Street, Suite 700
Tallahassee, FL 32301

Richard D. Melson
Hopping Green Sams & Smith
123 South Calhoun Street
Tallahassee, FL 32314


for Kimberly Caswell