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August 5, 1997

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

RE: Docket No. 960786-TL

Dear Mrs. Bayo:

Enclosed is an original and fifteen copies of the Prehearing Statement of BellSouth Telecommunications, Inc. We ask that this be filed in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver
J. Phillip Carver (AW)

- ACK
- AFA Enclosures
- APP
- CAF
- CML *Carver*
- CTR
- EAG
- LEG *2*
- LIM *5*
- OPT
- RCR
- SEC *1*
- WAS
- OTH

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

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OFFICE OF RECORDS

DOCUMENT NUMBER-DATE

07928 AUG-5 97

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth Telecommunications, Inc.'s entry into InterLATA Services pursuant to Section 271 of the Federal Telecommunications Act of 1996)
)
) Docket No. 960786-TL
)
) Filed: August 5, 1997
)
)

Prehearing Statement of BellSouth Telecommunications, Inc.

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with the Initial Order Establishing Procedure (Order No. PSC-96-0945-PCO-TL) issued July 19, 1997 and the Second Order Establishing Procedure (Order No. PSC-97-8703-PCO-TL) issued June 12, 1997, hereby submits its Prehearing Statement.

A. Witnesses

BellSouth proposes to call the following witnesses to offer direct and rebuttal testimony on the issues in this matter:

<u>Witness</u>	<u>Issues</u>
Alphonso J. Varner	All issues
Gloria Calhoun	2 - 15
W. Keith Milner	2 - 9, 12 - 15
William N. Stacy	3, 15a
Robert C. Scheye	2-15

BellSouth reserves the right to call witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address

DOCUMENT NUMBER-DATE

97028 AUG-35

FPCC-RECORDS/REPORTING

issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference to be held on August 19, 1997.

B. Exhibits

BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and the Rules of this Commission.

<u>Witness</u>	<u>Document Indicator</u>	<u>Title of Exhibit</u>
Alphonso J. Varner	Varner-Ex. 1	Congressional Record-House
	Varner-Ex. 2	Congressional Record-Senate
	Varner-Exhibit 3	Section 271 - Bell Operating Company Entry Into Interlata Services
	AJV-4	Eighth Circuit Court Ruling
	AJV-5	Tennessee Reply to the Tennessee Regulatory Authority
	AJV-6	Florida Retail, Resale and Unbundling Comparisons
	AJV-7	ACSI Reply
Gloria Calhoun	GC-1	Netscape (Address Validation
	GC-2	CLEC and BellSouth Access to Pre-Ordering

Gloria Calhoun (continued)

	Information
GC-3	Service Address - RNS
GC-4	Address Validation Screens
GC-5	Address Validation - Lens
GC-6	Lens - Telephone Number Screen
GC-7	Lens - Address Validation Screen
GC-8	RNS - Selection Screen
GC-9	DOE Screen
GC-10	RNS - Service Screen
GC-11	DOE - Product and Services Screen
GC-12	Due Date - RNS
GC-13	Screen - DOE
GC-14	Due Date Screen
GC-15	LENS - Customer Service Record Screen
GC-16	Exact Screens
GC-17	EDI Ordering Screen
GC-18	Electronic Ordering Flow
GC-19	Services Available for Ordering
GC-20	Summary RNS
GC-21	LENS screen

Gloria Calhoun (continued)	GC-22	LENS Screen - Firm Order Commitments
	GC-23	LENS - Error Notification Screen
	GC-24	LENS - Status Information Screen
	GC-25	TAFI - Function and Sub-Function Menus
	GC-26	BellSouth's Currently Available Electronic Interfaces
	GC-27	Ordering Capacity
	GC-28	BellSouth's Currently Available Electronic Interfaces
	GC-29	LENS - Customer Service Record Information
	GC-30	LENS User Guide
	GC-31	Local Exchange Ordering Implementation Guide
W. Keith Milner	WKM-1	Evidence That BellSouth is meeting its Checklist obligations Pursuant to Section 271(c)(2)(B) (I-xiv) of the Telecommunications Act of 1996 (88 Volumes)
	WKM-2	List of Contents
	WKM-3	ALEC Resale of BellSouth Services
William N. Stacy	WNS-A	Performance

William N. Stacy
(continued)

Measurement

WNS-B

Service Groups and
Measures; BellSouth/
AT&T Agreement

Robert C. Scheye

RSC-1

Statement of Generally
Available Terms and
Conditions For Inter-
connection, Unbundling
and Resale Provided By
BellSouth
Telecommunications, Inc.
In the State of Florida

RSC-2

BellSouth Price List -
Florida

RSC-3

Typical Applications

RSC-4

Section 271 Checklist
Items - Index

C. Statement of Basic Position

BellSouth has filed with this Commission, pursuant to Section 252 of the Act, a draft Statement of the Generally Available Terms and Conditions, and will file an actual Statement in the near future. This Commission should approve the Statement as compliant with Section 252(f) and with the Competitive Checklist found in Section 271(c)(2)(b). Further, this Commission should find that BellSouth has in place negotiated agreements, which have been filed with this Commission, by which it is providing interconnection arrangements, and that at least some of these arrangements are being utilized by competing providers to serve residential and business customers. Finally, this Commission should find that BellSouth's interconnection agreements, in conjunction with the Statement

filed by BellSouth, satisfy the 14-point Checklist, and should advise the FCC to this effect.

D. BellSouth's Position on the Issues

Issue No. 1: Has BellSouth met the requirements of Section 271(c)(1)(A) of the Telecommunications Act of 1996?

(a) Has BellSouth entered into one or more binding agreements approved under Section 252 with unaffiliated competing providers of telephone exchange service?

(b) Is BellSouth providing access and interconnection to its network facilities for the network facilities of such competing providers?

(c) Are such competing providers providing telephone exchange service to residential and business customers either exclusively over their own telephone exchange service facilities or predominantly over their own telephone exchange service facilities?

Position: Yes. BellSouth has entered into a number of binding agreements approved under Section 252 with unaffiliated competing providers, (b) BellSouth is providing access and interconnection to competitive providers that (c) are providing service to residential and business customers.

Issue No. 1.B.: Has BellSouth met the requirements of Section 271(c)(1)(B) of the Telecommunications Act of 1996?

(a) Has an unaffiliated competing provider of telephone exchange service requested access and interconnection with BellSouth?

Position: Yes, and agreements have been entered into, as described above in answer to Issue 1.

(b) Has a statement of terms and conditions that BellSouth generally offers to provide access and interconnection been approved or permitted to take effect under Section 252(f)?

Position: Not yet. BellSouth's Statement has not yet been approved by this Commission. BellSouth's statement, however, is fully compliant with Section 252(f) and should be approved.

Issue 1.C.: Can BellSouth meet the requirements of Section 271(c)(1) through a combination of Track A (Section 271(c)(1)(A)) and Track B (Section 271(c)(1)(B))? If so, has BellSouth met all of the requirements of those sections?

Position: Yes. BellSouth can meet the requirements of Section 271(c)(1)(A) through agreements for interconnection and access. To the extent that these agreements may not address particular checklist items, BellSouth may use the Statement to demonstrate the availability of these items.

Issue No. 2: Has BellSouth provided interconnection in accordance with the requirements of Sections 251(c)(2) and 252(d)(1) of the

Telecommunications Act of 1996, pursuant to 271(c)(2)(B)(i) and applicable rules promulgated by the FCC?

Position: Yes. Interconnection Services are functionally available from BellSouth, and BellSouth has procedures in place for the ordering, provisioning and maintenance of its interconnection services. As of June 1, 1997 BellSouth has provisioned approximately 7,612 trunks to interconnect its network with the network of ALECs in Florida.

Issue No. 3: Has BellSouth provided nondiscriminatory access to network elements in accordance with the requirements of Sections 251(c)(3) and 252(d)(1) of the Telecommunications Act of 1996, pursuant to 271(c)(2)(B)(ii) and applicable rules promulgated by the FCC?

Position: Yes. Access is available and provided to network elements on a nondiscriminatory basis. Also, a number of physical collection arrangements are in progress.

(a) Has BellSouth developed performance standards and measurements? If so, are they being met?

Position: Yes. BellSouth has reached agreement for performance measurements with AT&T and with other ALECs. BellSouth has taken steps, including changes to its organizational structure and processes, to ensure that these measures are met.

Issue No. 4: Has BellSouth provided nondiscriminatory access to the poles, ducts, conduits, and rights-of-way owned or controlled by BellSouth at just and reasonable rates in accordance with the requirements of Section 224 of the Communications Act of 1934 as amended by the Telecommunications Act of 1996, pursuant to 271(c)(2)(B)(iii) and applicable rules promulgated by the FCC?

Position: Yes. BellSouth provides nondiscriminatory access to poles, ducts, conduits and rights-of-way to any ALEC by way of a standard agreement. To date, 13 ALECs have executed this agreement. Also, the functional availability of this access is proven by the fact that BellSouth has provided it to interexchange carriers, cable television and power companies for years.

Issue No. 5: Has BellSouth unbundled the local loop transmission between the central office and the customer's premises from local switching or other services, pursuant to Section 271(c)(2)(B)(iv) and applicable rules promulgated by the FCC?

Position: Yes. Unbundled local loop transmission is functionally available from BellSouth. BellSouth has implemented procedures for the ordering, provisioning, and maintenance of unbundled loops and sub-loops. As of June 1, 1997, BellSouth has provisioned 1,085 unbundled loops to ALECs in Florida.

Issue No. 6: Has BellSouth unbundled the local transport on the trunk side of a wireline local exchange carrier switch from switching or other services, pursuant to Section 271(c)(2)(B)(v) and applicable rules promulgated by the FCC?

Position: Yes. Local transport is functionally available from BellSouth. BellSouth has technical service descriptions outlining dedicated and common interoffice transport and has procedures in place for the ordering, provisioning, and maintenance of these services. As of June 1, 1997, BellSouth has 277 dedicated trunks providing interoffice transport to ALECs in Florida.

Issue No. 7: Has BellSouth provided unbundled local switching from transport, local loop transmission, or other services, pursuant to Section 271(c)(2)(B)(vi) and applicable rules promulgated by the FCC?

Position: Yes. Unbundled local switching is functionally available from BellSouth. BellSouth has a technical service description and has procedures in place for the ordering, provisioning, and maintenance of its switched services. As of June 1, 1997, BellSouth has seven unbundled switch ports in service in Florida.

Issue No. 8: Has BellSouth provided nondiscriminatory access to the following, pursuant to Section 271(c)(2)(B)(vii) and applicable rules promulgated by the FCC:

(a) 911 and E911 services;

Position: Yes. BellSouth's statement offers local exchange providers nondiscriminatory access to 911 and E911 service. BellSouth has had procedures in place since early 1996 by which ALECs can connect their switches to BellSouth E911 tandems. As of June 1, 1997, BellSouth had 88 trunks in service connecting ALECs with BellSouth E911 arrangements in Florida.

(b) Directory Assistance Services to allow the other telecommunications carrier's customers to obtain telephone numbers; and

Position: Yes. Nondiscriminatory access to directory assistance (DA services) is functionally available from BellSouth. As of June 1, 1997, there were 156 directory assistance trunks in place serving ALECs in Florida.

(c) Operator call completion services?

Position: Yes. Operator call processing is functionally available from BellSouth, which allows ALECs to obtain both live operator and mechanized functionality. As of June 1, 1997, there were 31 such trunks in place serving ALECs in Florida.

Issue No. 9: Has BellSouth provided white pages directory listings for customers of other telecommunications carrier's telephone exchange service, pursuant to Section 271(c)(2)(B)(viii) and applicable rules promulgated by the FCC?

Position: Yes. BellSouth arranges with its directory publisher to make available white pages directory listings to ALECs and their subscribers which include the subscriber's name, address, and telephone number at no charge.

Issue No. 10: Has BellSouth provided nondiscriminatory access to telephone numbers for assignment to the other telecommunications carrier's telephone exchange service customers, pursuant to Section 271(c)(2)(B)(ix) and applicable rules promulgated by the FCC?

Position: Yes. BellSouth's Statement provides nondiscriminatory access to telephone numbers. Also, BellSouth, as the North American Numbering Plan administrator for its territory, ensures that ALECs have nondiscriminatory access to telephone numbers for assignment to their customers. As of June 23, 1997, BellSouth had assigned a total of 140 NPA/NNX codes for ALECs in Florida.

Issue No. 11: Has BellSouth provided nondiscriminatory access to databases and associated signaling necessary for call routing and completion, pursuant to Section 271(c)(2)(B)(x) and applicable rules promulgated by the FCC?

Position: Yes. BellSouth's Statement provides access to the signaling elements necessary for call routing and completion, including Signaling Links, Signal Transfer Points (STPs), and Service Control Points (SCPs). Moreover, from January through April, 1997, ALECs and other telecommunications

providers made approximately 8 million queries to BellSouth's 800 database, which evidences the functional availability of these services.

Issue No. 12: Has BellSouth provided number portability, pursuant to Section 271(c)(2)(B)(xi) and applicable rules promulgated by the FCC?

Position: Yes. BellSouth's Statement describes the interim number portability arrangements that are available, which include Remote Call Forwarding (RCF) and Direct Inward Dialing (DID). Interim number portability is functionally available from BellSouth, as evidenced by the fact that as of June 10, 1997, BellSouth has ported 2,484 business directory numbers and 14 residence directory numbers in Florida using interim number portability.

Issue No. 13: Has BellSouth provided nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of Section 251(b)(3) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(xii) and applicable rules promulgated by the FCC?

Position: Yes. Local service subscribers in BellSouth's service area in Florida dial the same number of digits to place a local call, without the use of an access code, regardless of their choice of local service provider. This satisfies the local dialing parity requirement.

Issue No. 14: Has BellSouth provided reciprocal compensation arrangements in accordance with the requirements of Section 252(d)(2) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(xiii) and applicable rules promulgated by the FCC?

Position: Yes. BellSouth has arrangements in place to provide reciprocal compensation. These arrangements provide for the mutual and reciprocal recovery of the costs of transporting and terminating local calls on BellSouth and ALEC networks.

Issue No. 15: Has BellSouth provided telecommunications services available for resale in accordance with the requirements of Sections 251(c)(4) and 252(d)(3) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(iv) and applicable rules promulgated by the FCC?

Position: Yes. ALECs are able to resell BellSouth's telecommunications services. BellSouth has developed technical service descriptions in ordering, provisioning, and maintenance procedures for 50 of its top retail telecommunications services. As of May 15, 1997, over 49,000 of these services were being resold by ALECs in Florida.

(a) Has BellSouth developed performance standards and measurements? If so, are they being met?

Position: BellSouth has developed processes for handling the ordering, provisioning, maintenance, and repair of all resold services.

BellSouth has also put organizations and processes in place to ensure that service standards are met.

Issue No. 16: By what date does BellSouth propose to provide interLATA [sic] toll dialing parity throughout Florida, pursuant to Section 271(e)(2)(A) of the Telecommunications Act of 1996?

Position: Section 271(e)(2)(A) requires the provision of intraLATA toll dialing parity by the time that BellSouth enters the interlata market. BellSouth has satisfied this requirement by providing 1+ intralata presubscription in all of its end offices since the end of March 1997.

Issue No. 17: If the answer to issues 2-15 is “yes”, have those requirements been met in a single agreement or through a combination of agreements?

Position: These requirements have been met through a combination of Agreements, and have been met as well by BellSouth’s Statement of Generally Available Terms and Conditions.

Issue No. 18: Should this docket be closed?

Position: This docket should be closed only after this Commission has concluded its consultative role to the FCC.

E. Stipulations

There have been no stipulations entered into by the parties at this time.

F. Pending Motions

There are two pending motions: (1) BellSouth's Motion for Extension of Time to File Objections; (2) Time Warners Motion to Dismiss.

G. Other Requirements

BellSouth knows of no requirements set forth in any Prehearing Order with which it cannot comply.

Respectfully submitted this 5th day of August, 1997.

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CERTIFICATE OF SERVICE
DOCKET NO. 960786-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 5th day of August, 1997 to the following:

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