

LAW OFFICES  
**MESSER, CAPARELLO & SELF**  
A PROFESSIONAL ASSOCIATION

**ORIGINAL**

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

December 9, 1997

**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

Re: Docket Nos. 960757-TP

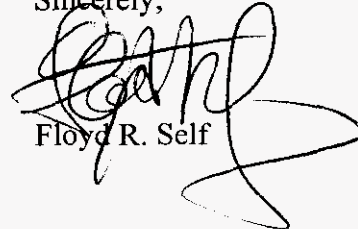
Dear Ms. Bayo:

Enclosed for filing are an original and fifteen copies of Prehearing Statement of WorldCom, Inc. in the above-referenced docket. Also enclosed is a 3 1/2" diskette with the document on it in Word Perfect 6.0/6.1 format.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,



Floyd R. Self

FRS:amb  
Enclosures  
cc: Mr. Brian Sulmonetti  
Parties of Record

RECEIVED & FILED  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
12578 DEC-96  
FPSC-RECORDS/REPORTING

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Metropolitan )  
Fiber Systems of Florida, Inc. for )  
arbitration with BellSouth )  
Telecommunications, Inc. ) Docket No. 960757-TP  
concerning interconnection ) Filed: December 9, 1997  
rates, terms, and conditions, )  
pursuant to the Federal )  
Telecommunications Act of 1996 )  
\_\_\_\_\_ )

**PREHEARING STATEMENT OF  
WORLD COM, INC.**

WorldCom, Inc., for itself and its subsidiary Metropolitan Fiber Systems of Florida, Inc. (hereinafter, collectively "WorldCom"), through undersigned counsel, having merged since the initiation of this docket herewith jointly submit this prehearing statement.

**A. APPEARANCES**

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

and

Richard M. Rindler, Esq. and Morton Posner, Esq.  
Swidler & Berlin, Chartered  
3000 K Street, N.W., Suite 300  
Washington, DC 20007

On behalf of WorldCom, Inc.

**B. WITNESSES**

Witness  
David Porter  
(Direct and Rebuttal Testimony )

Issues  
I.C., I.D., I.H., and I.I.

DOCUMENT NUMBER-DATE

12578 DEC-95

FPSC-RECORDS/REPORTING

### C. EXHIBITS

<u>Number</u>	<u>Witness</u>	<u>Description</u>
DNP-1 (direct)	Porter	Proposed Efficient ILEC changes to convert ADSL & HDSL Loops
DNP-2 (direct)	Porter	Interim Rates for Physical Collocation
DNP-3 (Direct)	Porter	BellSouth Birmingham ADSL Service

### D. BASIC POSITION

Recurring and nonrecurring prices set in this proceeding should be set as TSLRIC cost. BellSouth's attempt to include shared and common costs and its new residual recovery requirements should be rejected as they violate the directive in the Commission's prior orders for price setting. An evaluation of BellSouth's nonrecurring cost study reveals unnecessary services and other excessive work functions and time frames that grossly inflate the results of their study and which should, therefore, be rejected. Finally, BellSouth's efforts to introduce prices for OSS and vertical features should be rejected as they are outside the scope of this proceeding and prior Commission decisions.

### E. ISSUES AND POSITIONS

**ISSUE 1: What are the appropriate permanent recurring and non-recurring rates for the following unbundled network elements:**

**ISSUE 1.A.: Network interface device (NID).**

WorldCom's Position: Not at issue for WorldCom.

**ISSUE 1.B.: 2-wire/4-wire Loop Distribution.**

WorldCom's Position: Not at issue for WorldCom.

**ISSUE 1.C.: Virtual collocation.**

WorldCom's Position: Adopt MCI and AT&T's positions.

**ISSUE 1.D.: Physical collocation.**

WorldCom's Position: The Commission should approve the rates on Exhibit DNP-2.

BellSouth's proposed rates should be rejected because they include costs for "Business Marketing" and other unnecessary functions as well as unrealistically inflated services and tasks that unfairly attempt to shift sunk labor costs to competitors.

**ISSUE 1.E.: Directory Assistance.**

WorldCom's Position: Not at issue for WorldCom.

**ISSUE 1.F.: Dedicated transport (Nonrecurring only).**

WorldCom's Position: Not at issue for WorldCom.

**ISSUE 1.G.: 4-wire analog port.**

WorldCom's Position: Not at issue for WorldCom.

**ISSUE 1.H.: 2-wire ADSL-compatible loop.**

WorldCom's Position: The TSLRIC-based recurring charge should be no more than \$16.32, and the nonrecurring charges, should be \$19.50 for the first loop and \$10.87 for each additional loop. BellSouth's attempt to include shared and common costs and a residual recovery charge in the recurring charge are inappropriate. BellSouth's proposed nonrecurring charges in excess of \$600.00 grossly excessive as they include unnecessary and inflated work functions and times.

**ISSUE 1.I.: 2-wire/4-wire HDSL-compatible loop.**

WorldCom's Position: The TSLRIC-based recurring charge for 2-wire HDSL should

be no more than \$11.52 and the recurring charge for 4-wire HDSL should be no more than \$7.86. The nonrecurring charges for HDSL loops should be \$19.50 for the first loop and \$10.87 for each additional loop. BellSouth's attempt to include shared and common costs and a residual recovery charge in the recurring charge are inappropriate. BellSouth's proposed nonrecurring charges in excess of \$600.00 grossly excessive as they include unnecessary and inflated work functions and times.

**F. PENDING MOTIONS FILED BY WORLDCOM, INC.**

WorldCom, Inc. has no pending motions at this time.

**G. REQUIREMENTS THAT CANNOT BE COMPLIED WITH**

WorldCom, Inc. knows of no requirements that cannot be complied with.

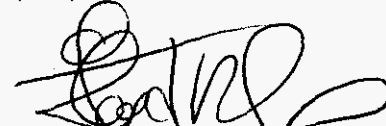
Dated this 9th day of December, 1997.

Respectfully submitted,

Richard M. Rindler, Esq.  
Morton Posner, Esq.  
Swidler & Berlin, Chartered  
3000 K Street, N.W., Suite 300  
Washington, DC 20007

and

MESSER, CAPARELLO & SELF, P.A.  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
(904) 222-0720



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FLOYD R. SELF, ESQ.  
NORMAN H. HORTON, JR., ESQ.

Attorneys for WorldCom, Inc.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of Prehearing Statement of Worldcom, Inc. in Docket No. 960757-TP have been served upon the following parties by Hand Delivery (\*) and/or U. S. Mail this 9th day of December, 1997.

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

Ms. Nancy White\*  
c/o Ms. Nancy Sims  
BellSouth Telecommunications, Inc.  
150 S. Monroe Street, Suite 400  
Tallahassee, FL 32301

Richard D. Melson\*  
Hopping Green Sams & Smith  
123 S. Calhoun St.  
Tallahassee, FL 32301

Thomas K. Bond  
MCI Telecommunications  
780 Johnson Ferry Road, Suite 700  
Atlanta, GA 30342

Tracy Hatch, Esq.\*  
AT&T  
101 N. Monroe St., Suite 700  
Tallahassee, Florida 32301

Mike Tye, Esq.\*  
AT&T  
101 N. Monroe St., Suite 700  
Tallahassee, Florida 32301

  
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Floyd R. Self