

HOPPING GREEN SAMS & SMITH
PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET
POST OFFICE BOX 6526
TALLAHASSEE, FLORIDA 32314
(904) 222-7500
FAX (904) 224-5551
FAX (904) 425-3415

ORIGINAL

JAMES S. ALVES
BRIAN M. BIBEAU
KATHLEEN BLIZZARD
ELIZABETH C. BOWMAN
RICHARD S. BRIGHTMAN
PETER C. CUNNINGHAM
RALPH A. DeMEO
THOMAS M. DeROSE
WILLIAM H. GREEN
WADE L. HOPPING
FRANK E. MATTHEWS
RICHARD D. NELSON
MICHAEL P. PETROVICH
DAVID L. POWELL
WILLIAM D. PRESTON
CAROLYN S. RAEPPLÉ
DOUGLAS S. ROBERTS
GARY P. SAMS
ROBERT P. SMITH
CHERYL G. STUART

GARY K. HUNTER, JR.
JONATHAN T. JOHNSON
ROBERT A. MANNING
ANGELA R. MORRISON
GARY V. PERHO
KAREN M. PETERSON
R. SCOTT RUTH
W. STEVE BYRES
T. KENT WETHERELL, II
OF COUNSEL
W. ROBERT FOXES

Writer's Direct Dial No.
(850) 425-2313

January 27, 1998

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

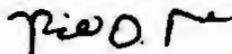
Re: Docket No. ~~XXXXXXXXXX~~

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Telecommunications Corporation are the original and 15 copies of MCI's Supplemental Pre-Hearing Statement in the above referenced docket.

By copy of this letter this document has been provided to the parties on the attached service list.

Very truly yours,



Richard D. Nelson

ACK _____

AFA _____ RDN/clp

APP Adm Enclosures

CAF 2 cc: Per Certificate of Service

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Proposed Rule 25-24.845,)
F.A.C., Customer Relations; Rules) Docket No. 970622-TI
Incorporated, and Proposed Amendments)
to Rules 25-4.003, F.A.C., Definitions;)
25-4.110, F.A.C., Customer Billing;) Filed: January 27, 1998
25-4.118, F.A.C., Interexchange Carrier)
Selection; 25-24.490, F.A.C., Customer)
Relations; Rules Incorporated.)

MCI'S SUPPLEMENTAL PRE-HEARING STATEMENT

MCI Telecommunications Corporation (MCI) hereby files its supplemental pre-hearing statement in accordance with the directives of the Chairman at the pre-hearing conference held January 23, 1998. MCI's supplemental pre-hearing statement addresses only the Issues, and as agreed by the parties and directed by the Chairman, MCI states the following as its position on the issues:

Issue 1: Should the Commission adopt the new Rule 25-24.845, FAC as proposed by the Commission at the December 16, 1998, agenda conference?

MCI: Other than the specific objections that MCI has stated in its testimony and pre-hearing statements, MCI does not generally object to customer billing requirements and provider selection rules applying to ALECs.

Issue 2: Should the Commission amend Rule 25-4.003 as proposed by the Commission at the December 16, 1998, agenda conference?

MCI: MCI does not oppose the definitions proposed by the Commission. One very important definition is missing, however, and should be added. Nowhere in the Commission's proposed definitions is "unauthorized provider change" defined. MCI suggests that an unauthorized carrier change be defined as the conversion of a consumer's local or toll provider without the consumer's consent obtained through

appropriate verification.

Issue 3: Should the Commission amend Rule 25-24.110 as proposed by the Commission at the December 16, 1998, agenda conference?

MCI: No. The requirement of including the carrier's certificate number on the customer bill should be eliminated as redundant and unnecessary.

Revisions to the proposal to block third party billing on LEC invoices are necessary so that national billing processes currently observed throughout the telecommunications industry are not adversely impacted in Florida.

Issue 4: Should the Commission amend Rule 25-4.118 as proposed by the Commission at the December 16, 1998, agenda conference?

MCI: No. The Commission should approve verification methods consistent with the FCC. The Commission should not require TPV to be tape recorded. The Commission should ensure that the TPV provider/vendor is truly independent from the carrier.

LOAs should not be relied upon as a more effective verification method.

LECs should not be relied upon to settle PIC disputes.

The 90-day credit to any consumer experiencing an "undefined" unauthorized PIC change should be deleted, as well as the additional re-rating of calls up to twelve months.

Monthly slamming reports by carriers should not be required.

PIC freeze information should not be required to be advocated by carriers to all potential consumers in marketing situations.

Modifications to the proposal to require the disassociation of LEC billing for "unauthorized" service should be made so that legitimate, tariffed and regulated charges incurred may be appropriately billed to the user.

The proposal to require a match of the consumer's name, address and telephone number in the transmittal order with that of the LEC should be eliminated.

In a competitive environment, the Commission should not impose requirements on the customer service operations of long distance providers, other than a requirement that customer service should be reasonably available to consumers via toll-free access.

Issue 5: Should the Commission amend Rule 25-24.490 as proposed by the Commission at the December 16, 1998, agenda conference?

MCI: Other than the specific objections that MCI has stated in its testimony and pre-hearing statements, MCI does not generally object to the rules applying to IXCs.

RESPECTFULLY SUBMITTED this 27th day of January, 1998.

HOPPING GREEN SAMS & SMITH, P.A.

By: Richard D. Nelson
Richard D. Nelson
Post Office Box 6526
123 South Calhoun Street
Tallahassee, FL 32314
904/222-7500

and

Thomas K. Bond
Marsha A. Ward
MCI TELECOMMUNICATIONS CORP.
780 Johnson Ferry Road, Ste. 700
Atlanta, GA 30342

Attorneys for MCI
Telecommunications Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery (*) or U.S. Mail this 27th day of January, 1998.

Diana Caldwell *
Division of Appeals
FL Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Walter D'Haeseleer
Director of Communications
FL Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Michael A. Gross
Department of Legal Affairs
PL-01, The Capitol
Tallahassee, FL 32399-1050

Robert G. Beatty
Nancy White
c/o Nancy Sims
BellSouth Telecommunications
150 So. Monroe St., Ste. 400
Tallahassee, FL 32301

Charles J. Beck *
Office of Public Counsel
111 West Madison Street
Tallahassee, FL 32399

Tracy Hatch
Marsha Rule
AT&T Communications
101 N. Monroe, Ste. 700
Tallahassee, FL 32301

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs & Ervin
Post Office Drawer 1170
Tallahassee, FL 32302

Patrick K. Wiggins
Wiggins & Villacorta
501 E. Tennessee St., Ste. B
Tallahassee, FL 32302

Benjamin Fincher
Sprint Communications
3100 Cumberland Circle
Atlanta, GA 30339

Ky E. B. Kirby
Warren A. Fitch
Don W. Blevins
Swidler & Berlin
3000 K. Street, N.W.
Washington, DC 20007

Suzanne Fannon Summerlin
Suite 201
1311-B Paul Russell Road
Tallahassee, FL 32301

Charles Rehwinkel
Sprint/United Florida
Sprint/Centel Florida
Post Office Box 2214
Tallahassee, FL 32316

Andrew O. Isar
Director, Industry Relations
Telecommunications Resellers Assn.
4312 92nd Avenue, N.W.
Gig Harbor, WA 98335-4461

Greg L. Eriksen
Levine & Eriksen
2560 North Santiago Blvd.
Orange, CA 92667

Pamela Melton
Regulatory Counsel
LCI International Telecom Corp.
8180 Greensboro Dr., Ste. 800
McLean, Virginia 22101

Michael L. Glaser
Canora T. Podd
Miligman and Lottner, P.C.
First Interstates Tower North
633 Seventeenth Street, Suite 2700
Denver, CO 80202

Joseph A. McGlothlin
McWhirter, Reeves, McGlothlin
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, FL 32301

Carolyn Matak
Vice President of
Regulatory Affairs
Southeast Region
Time Warner Communications
Post Office Box 210706
Nashville, TN 37221

Kimberly Caswell
GTE Florida Incorporated
Post Office Box 11, FLTC0007
Tampa, FL 33601-0110

Peter M. Dunbar
Barbara D. Auger
Pennington, Moore, Wilkinson
& Dunbar, P.A.
Post Office Box 10095
Tallahassee, FL 32302

Peter M. Dunbar

Attorney