

In re: Motions of AT&T
 Communications of the Southern
 States, Inc. and MCI
 Telecommunications Corporation
 and MCI Metro Access
 Transmission Services, Inc. to
 compel BellSouth
 Telecommunications, Inc. to
 comply with Order PSC-96-1579-
 FOF-TP and to set non-recurring
 charges for combinations of
 network elements with BellSouth
 Telecommunications, Inc.
 pursuant to their agreement.

DOCKET NO. 971140-TP

DATED: FEBRUARY 20, 1998

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-98-0090-PCO-TP, the Staff of the Florida Public Service Commission files its Prehearing Statement.

- A. All Known Witnesses: Staff proposes to call the following witness to offer direct testimony on the issues in this docket:

Ruth K. Young Issue 8

Staff reserves the right to call rebuttal witnesses or witnesses to address additional issues that may be raised at the prehearing conference February 27, 1998.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN 5 _____
- CRS _____
- ROH _____
- SEC 1 _____
- WAS _____
- OTH _____

- B. All Known Exhibits:

The following is a tentative list of exhibits staff intends to use in this proceeding:

<u>Witness</u>	<u>Document</u>	<u>Exhibit Title</u>
R.K. Young	_____ (RKY-1)	Auditor's Report
	_____ (RKY-2)	46-3 Series Workpapers

DOCUMENT NUMBER-DATE
02458 FEB 20 1998
 FPSC-RECORDS/REPORTING

<u>Witness</u>	<u>Document</u>	<u>Exhibit Title</u>
R.K. Young	_____ (RKY-3)	44 Series Workpapers (selected)

Staff reserves the right to file exhibits to any additional testimony as may be filed in the circumstances identified in Part A above. Staff also reserves the right to introduce exhibits for the purpose of cross-examination, impeachment or any other authorized purpose pursuant to the Florida Rules of Civil Procedure and the rules of the Commission.

C. Staff's Statement of Basic Position:

None pending discovery.

D. Staff's Position on the Issues:

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions.

ISSUE 1: Does the BellSouth-MCI interconnection agreement specify how prices will be determined for combinations of unbundled network elements

(a) that do not recreate an existing BellSouth retail telecommunications service?

(b) that do create an existing BellSouth retail telecommunications service?

STAFF: (a) Yes.
(b) Yes.

ISSUE 2: If the answer to either part or both parts of Issue 1 is yes, how is the price(s) determined?

STAFF: For Issue 1(a), their Agreement requires BellSouth to provide network elements as defined in 47 C.F.R. §51.319 to MCI individually or combined at the prices for the individual elements established by the Commission in Order No. PSC-96-1579-FOF-TP and set forth in the Agreement in Attachment 1, Table 1. The prices for combinations of network elements should be determined as the sum of the prices of the individual elements comprising the combination, subject to true-up upon the establishment in this proceeding of non-recurring charges for combinations free of duplicate and unnecessary charges.

For Issue 1(b), staff's position is the same as Issue 1(a).

ISSUE 3: If the answer to either part or both parts of Issue 1 is no, how should the price(s) be determined?

STAFF: See staff position in Issue 1.

ISSUE 4: Does the BellSouth-AT&T interconnection agreement specify how prices will be determined for combinations of unbundled network elements

(a) that do not recreate an existing BellSouth retail telecommunications service?

(b) that do create an existing BellSouth retail telecommunications service?

STAFF: (a) Yes.
(b) Yes.

ISSUE 5: If the answer to either part or both parts of Issue 4 is yes, how is the price(s) determined?

STAFF: For Issue 4(a), their Agreement requires BellSouth to provide network elements as defined in 47 C.F.R. §51.319

to AT&T individually or combined at the prices for the individual elements established by the Commission in Order No. PSC-96-1579-FOF-TP. The Agreement requires BellSouth to provide AT&T with access to its network for purpose of combining network elements in order to provide telecommunications services if AT&T purchases the elements individually. The prices for combinations of network elements provided by BellSouth should be determined as the sum of the prices of the individual elements comprising the combination, plus a charge reflecting the cost of combining where the elements are not already combined, subject to true-up upon the establishment in this proceeding of non-recurring charges for combinations free of duplicate and unnecessary charges.

For Issue 4(b), staff's position is the same as Issue 4(a).

ISSUE 6: If the answer to either part or both parts of 4 is no, how should the price(s) be determined?

STAFF: See staff position in Issue 4.

ISSUE 7: What standard should be used to identify what combinations of unbundled network elements recreate existing BellSouth retail telecommunications services?

STAFF: The pricing standard for unbundled network elements used to recreate a service is the sum of the rates for each element. The standard for retail services purchased for resale is the retail rate less the wholesale discount.

ISSUE 8: What is the appropriate non-recurring charge for each of the following combinations of network elements for migration of an existing BellSouth customer:

- (a) 2-wire analog loop and port;
- (b) 2-wire ISDN loop and port;
- (c) 4-wire analog loop and port; and
- (d) 4-wire DS1 and port?

STAFF: The non-recurring rates for migrating an existing customer's loop and port should be based only on the cost associated with that transition.

ISSUE 9: Does the BellSouth-MCIm interconnection agreement require BellSouth to record and provide MCIm with the switched access usage data necessary to bill interexchange carriers when MCIm provides service using unbundled local switching purchased from BellSouth either on a stand-alone basis or in combination with other unbundled network elements?

STAFF: Yes. BellSouth should provide MCIm with the appropriate usage data for all billable calls for all types of calls (including calls involving switched access service) made by MCIm customers through unbundled network elements, pursuant to 47 C.F.R. §51.319(f) and Attachment III, Section 7.2.1.9 of their Agreement.

ISSUE 10: Does the AT&T-BellSouth interconnection agreement require BellSouth to record and provide AT&T with detail usage data for switched access service, local exchange service and long distance service necessary for AT&T to bill customers when AT&T provides service using unbundled network elements either alone or in combination?

STAFF: Yes. BellSouth should provide AT&T with testing of ordering, provisioning and billing pursuant to 47 C.F.R. §51.319(f) and Attachment 7, Sections 1, 2 and 3, of their Agreement.

E. Stipulations

Staff is not aware of any issues or other matters that have been stipulated at this time.

F. Pending Motions:

(1) Staff has no motions of its own pending at this time.

(2) MCI filed a supplement to its motion to compel compliance on December 19, 1997. AT&T filed a supplement to its motion to compel compliance on January 6, 1998. BellSouth filed its response to MCI's supplement on December 24, 1997.

RESPECTFULLY SUBMITTED,



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Motions of AT&T
Communications of the Southern
States, Inc. and MCI
Telecommunications Corporation
and MCI Metro Access
Transmission Services, Inc. to
compel BellSouth
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network elements with BellSouth
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pursuant to their agreement.

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FILED: FEBRUARY 20, 1998

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that one true and correct copy of Staff's
Prehearing Statement has been furnished **by U.S. Mail** this 20th day
of February, 1998, to the following:

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