# **ORIGINAL**

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Resolution by Holmes County Board of County Commissioners for Extended Area Service in Holmes County.	Docket No. 870248-TL ) ) )
In Re: Request by Gilchrist County Commissioners for Extended Area Service Throughout Gilchrist County.	Docket No. 870790-TL
In Re: Resolution by the Orange County Board of County Commissioners for Extended Area Service Between the Mount Dora Exchange and the Apopka, Orlando, Winter Garden, Winter Park, East Orange, Reedy Creek, Windermere, and Lake Buena Vista Exchanges.	Docket No. 900039-TL  ) ) ) ) )
In Re: Resolution by Bradford County Commission Requesting Extended Area Service Within Bradford County and Between Bradford County, Union County and Gainesville.	Docket No. 910022-TL
In Re: Request by Putnam County Board of County Commissioners for Extended Service Between the Crescent City, Hawthorne, Orange Springs, and Melrose Exchanges, and the Palatka Exchange.	Docket No. 910528-TL ) ) )
In Re: Request by Pasco County Board of County Commissioners for Extended Service Between All Pasco County Exchanges.	Docket No. 910529-TL ) )
In Re: Request for Extended Area Service Between All Exchanges Within Volusia County by Volusia County Council.	) Docket No. 911185-TL ) )

DOCUMENT NUMBER-DATE

FPSC-RECORDS/REPORTING

In Re: Resolution by the Palm Beach County Board of County Commissioners for Extended Area Service Between All Exchanges in Palm Beach County.	) ) ) )	Docket No. 92 1193-TL
In Re: Petition by the Residents of Polo Park Requesting Extended Area	)	Docket No. 930173-TL
Service (EAS) Between the Haines City	)	
Exchange and the Orlando, West Kissimmee, Lake Buena Vista, Windermere,	) )	Filed: May 1, 1998
Reedy Creek, Winter Park, Clermont,	)	
Winter Garden and St. Cloud Exchanges.	)	
	,	

# THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S PREHEARING STATEMENT

Pursuant to Order No. PSC-97-1462-PCO-TL, the Florida Competitive Carriers Association (FCCA) files its Prehearing Statement.

#### A. APPEARANCES:

JOSEPH A. MCGLOTHLIN and VICKI GORDON KAUFMAN, McWhirter, Reeves, McGlothlin, Davidson, Rief and Bakas, P.A., 117 South Gadsden Street, Tallahassee, Florida 32301

On behalf of the Florida Competitive Carriers Association.

#### B. WITNESSES:

None.

#### C. EXHIBITS:

None.

#### D. STATEMENT OF BASIC POSITION:

#### Florida Competitive Carriers Association's Statement of Basic Position:

The Telecommunications Act of 1996 prohibits discrimination among telecommunications carriers. Therefore, BellSouth must charge the same

amount to any carrier for whom it terminates a call. In the case of ECS calls, BellSouth should charge the appropriate interconnection rate.

V.

### E. STATEMENT OF ISSUES AND POSITIONS:

1. <u>ISSUE</u>: Is one-way ECS appropriate on the routes in question?

<u>FCCA</u>: No. In a competitive market, it is not the Commission's role to require carriers to provide particular services. The Commission should refrain from requiring any more ECS discounts.

2. <u>ISSUE</u>: If one-way ECS is appropriate, what rate, if any, should BellSouth charge to terminate ECS interLATA traffic for all carriers?

<u>FCCA</u>: If the Commission requires one-way ECS, the Commission should require BellSouth to charge interconnection rates for termination of the ECS calls.

3. <u>ISSUE</u>: If one-way ECS is ordered on the routes in question and a termination charge is deemed appropriate, what economic impact will this have on the originating LECs?

FCCA: No position.

4. <u>ISSUE</u>: If one-way ECS is appropriate, what rate structure and rate levels should the LECs charge?

FCCA: See Issue 2.

#### F. STIPULATED ISSUES:

None.

#### G. PENDING MOTIONS:

None.

## H. OTHER MATTERS:

FCCA requests that it be excused from attendance at the final hearing in this docket and that it be permitted to submit a brief on the issues.

Joseph A. McGlothlin

Vicki Gordon Kaufman

McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A.

117 South Gadsden Street Tallahassee, Florida 32301

Telephone: (850) 222-2525

Attorneys for the Florida Competitive Carriers Association

١.

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the FCCA's Prehearing Statement has been furnished by (\*) hand delivery or U.S. Mail to the following parties of record this 1st day of May, 1998:

Mary Beth Keating\*
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Nancy B. White BellSouth Telecommunications, Inc. Museum Tower Building, Suite 1910 150 West Flagler Street Miami, Florida 33130

Jeffry Wahlen Ausley & McMullen 227 South Calhoun Street (32301) Post Office Box 391 Tallahassee, Florida 32302

Holmes County Board of Commissioners 210 North Oklahoma Street Bonifay, Florida 32425

Marsha Rule
AT&T Communications of the Southern
States, Inc.
101 North Monroe Street, Suite 700
Tallahassee, Florida 32301-1549

Burt & Lancaster 114 East First Street Trenton, Florida 32693

Assistant County Attorney
Palm Beach County Board of
Commissioners
Post Office Box 1989
West Palm Beach, Florida 33402

Orange County Board of Commissioners Post Office Box 1393 Orlando, Florida 32802-1393

Lynn B. Hall Vista United Telecommunications, Inc. Post Office Box 10180 Lake Buena Vista, Florida 32830-0180

Starke-Bradford Counties Chamber of Commerce Post Office Box 576 Starke, Florida 32091

David B. Erwin
Post Office Box 1833
Tallahassee, Florida 32302-1833

Kimberly Caswell GTE Florida Incorporated Post Office Box 110, FLTC0007 Tampa, Florida 33601-0110

Pasco County Board of Commissioners 30853 Live Oak Avenue Dade City, Florida 33525

Director, Volusia County Communications 119 West Indiana Avenue DeLand, Florida 32720

(lilli Hordon Laufman
Vicki Gordon Kaufman