

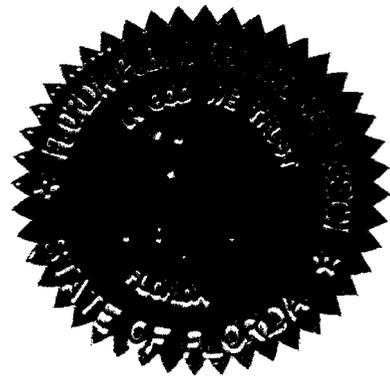
BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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In the Matter of

Request for arbitration
concerning complaint of The
Other Phone Company, Inc.
d/b/a Access One
Communications against
BellSouth Telecommunications,
Inc. regarding breach of
resale agreement.

DOCKET NO. 990108-TP



PROCEEDINGS: **PREHEARING CONFERENCE**

BEFORE: COMMISSIONER JULIA L. JOHNSON
 Prehearing Officer

DATE: **Friday, July 30, 1999**

TIME: Commenced at 11:00 a.m.
 Concluded at 11:20 a.m.

PLACE: Betty Easley Conference Center
 Room 152
 4075 Esplanade Way
 Tallahassee, Florida

REPORTED BY: KIMBERLY K. BERENS, CSR, RPR
 FPSC Commission Reporter

DOCUMENT NUMBER - DATE
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1 **APPEARANCES:**

2 **ROBERT W. TURKEN** and **SEAN CLEARY**, Stroock
3 Law Firm 200 South Biscayne Boulevard, 33rd Floor,
4 Miami, Florida 33131-2385, appearing on behalf of
5 **Access One Communications, Inc.**

6 **PHILLIP CARVER**, BellSouth
7 Telecommunications, Inc., c/o Nancy Sims, 150 South
8 Monroe Street, Suite 400, Tallahassee, Florida 32301,
9 appearing on behalf of **BellSouth Telecommunications,**
10 **Inc.**

11 **WILLIAM COX**, Florida Public Service
12 Commission, Office of the General Counsel, 2540
13 Shumard Oak Boulevard, Tallahassee, Florida
14 32399-0870, appearing as **Counsel to the Commissioners.**

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P R O C E E D I N G S

(Hearing convened at 11:00 a.m.)

COMMISSIONER JOHNSON: Let me go ahead and call this prehearing to order. And, counsel, could you please read the Notice.

MR. COX: Pursuant to Notice this time and place have been set for a prehearing conference in Docket No. 990108-TP, request for arbitration concerning the complaint of The Other Phone Company Inc., doing business as Access One Communications against BellSouth Telecommunications Inc., regarding breach of resale agreement.

COMMISSIONER JOHNSON: Thank you. We'll take appearances starting with Access One.

MR. TURKEN: This is Robert Turken of the firm of Stroock and Stroock and Lavan. I am joined by my colleague, Sean Cleary, and we represent Access One Communications, Inc.

COMMISSIONER JOHNSON: Thank you. And BellSouth.

MR. CARVER: Phillip Carver for BellSouth, 675 West Peachtree Street, Atlanta, Georgia 30375.

COMMISSIONER JOHNSON: And Staff.

MR. COX: William Cox and Donna Clemons appearing on behalf of the Commission Staff.

1 **COMMISSIONER JOHNSON:** Thank you. Staff,
2 would there be any preliminary matters before we start
3 going through the prehearing order?

4 **MR. COX:** Yes, Commissioner Johnson. There
5 are two preliminary matters that I would recommend we
6 take up from the start. I'm not sure if the party's
7 have any others, but there's only two that I'm aware
8 of. The first is, there is a motion filed by Access
9 One to supplement the rebuttal testimony of its
10 witness, Ken Baritz.

11 Staff's understanding that there is no
12 opposition from BellSouth and Staff has no opposition
13 to granting the motion.

14 **COMMISSIONER JOHNSON:** Okay. Then -- and it
15 has been officially filed?

16 **MR. COX:** Yes. It was filed with the filing
17 of the supplemental rebuttal.

18 **COMMISSIONER JOHNSON:** Okay. Show that then
19 granted with no objection.

20 **MR. COX:** The other item is something that
21 we're still waiting on, but it's a stipulation on
22 Issue 4. It's an issue involving repair issues.

23 **MR. TURKEN:** This is Robert Turken.
24 Yesterday Michael Goggin of BellSouth and I agreed to
25 the language of a stipulation. Because of logistics,

1 we have not yet had an opportunity to have it filed
2 with the Commission. I am authorized to read it to
3 the Commission, and if the Commission prefers we will
4 also file a hard copy at the beginning of the week.

5 **COMMISSIONER JOHNSON:** Okay. I think we'd
6 like to see a hard copy, but if you could, for
7 purposes of the record, go ahead and read that in.

8 **MR. TURKEN:** Okay. Phil, I assume you'll be
9 able to follow along with what I'm reading?

10 **MR. CARVER:** Yes. I have a copy here and I
11 will just read along as you read it out loud.

12 **MR. TURKEN:** Okay. "Stipulation. Access
13 One Communications, Inc. (Access One) and BellSouth
14 Telecommunications, Inc., (BellSouth) have agreed to
15 resolve Issue 4 in this matter.

16 Issue 4 concerned the question of whether
17 BellSouth offers the same repair scheduling options to
18 Access One customers that it offers to its own retail
19 customers.

20 BellSouth represents and confirms that it
21 offers all ALEC customers the same repair scheduling
22 options that it offers its own retail customers and
23 will continue to do so.

24 Based on this representation, the parties
25 believe that there is no need for the Commission to

1 address this issue and request that the Commission
2 delete this issue from the list of issues to be
3 decided in this matter."

4 **COMMISSIONER JOHNSON:** Staff.

5 **MR. COX:** That's all we have. We would hope
6 that that hard copy would come in before the hearing,
7 which is scheduled for August 11th.

8 **MR. TURKEN:** I can assure you that it will.

9 **COMMISSIONER JOHNSON:** Is there a time
10 certain that you can have that in?

11 **MR. TURKEN:** The only -- the only logistics
12 is getting it signed.

13 **COMMISSIONER JOHNSON:** Okay.

14 **MR. TURKEN:** Phil, what I will do, there are
15 two ways, I guess, we could have -- since we have the
16 deposition scheduled in Atlanta on Tuesday --

17 **MR. CARVER:** Uh-huh.

18 **MR. TURKEN:** Are you going to be there?

19 **MR. CARVER:** No, I won't be. I was going to
20 suggest, since you're in Miami, it may be best just to
21 have either Nancy or Michael sign it. That way it
22 will probably get signed Monday.

23 **MR. TURKEN:** Okay. Because Michael, I know
24 is not here -- is not going to be here for the next
25 week, so I need to have somebody in Miami I can send

1 it to. Should I send it to Nancy?

2 **MR. CARVER:** Yes. I think that would work
3 best.

4 **MR. TURKEN:** Okay. And then we will have
5 that signed on Monday and we will have that Federal
6 Expressed to Tallahassee.

7 **COMMISSIONER JOHNSON:** Okay. Then the order
8 will reflect that stipulation as read and signed and
9 forwarded to Staff. Anything else in terms of a
10 preliminary matter?

11 **MR. COX:** I think that's all the preliminary
12 matters, and we're just ready to go through the order
13 itself.

14 **COMMISSIONER JOHNSON:** Okay. What I will
15 do, gentlemen and ladies, I will just walk through
16 each page, and to the extent that there is a question,
17 a change, or an addition, please feel free to state
18 your name and I'll allow you to make your comments.

19 Page 1. (No response.)

20 Page 2. (No response.)

21 Page 3. (No response.)

22 Page 4. (No response.)

23 **MR. CARVER:** This is Phil Carver. One thing
24 I just wanted to suggest, although I don't have strong
25 feelings about this one way or the other, is that I

1 noticed in the order of witnesses, the direct
2 witnesses and rebuttal are listed separately. It
3 might move things along a little more quickly if
4 witnesses who had both direct and rebuttal testimony
5 took the stand one time rather than two.

6 **COMMISSIONER JOHNSON:** Uh-huh.

7 **MR. CARVER:** So I'd just like to suggest
8 that.

9 **COMMISSIONER JOHNSON:** What would be the
10 pleasure of the other parties? Access One?

11 **MR. TURKEN:** That's fine.

12 **COMMISSIONER JOHNSON:** Staff?

13 **MR. COX:** That is fine.

14 **COMMISSIONER JOHNSON:** Okay. We'll have --
15 when the witness comes forward we'll revise this
16 calendar -- this schedule to reflect that they will
17 provide their direct and their rebuttal in a
18 consolidated fashion.

19 Anything else on the order of witnesses?

20 Okay. Then going to Page 5, the basic
21 positions of the parties. Access One, any changes or
22 additions?

23 **MR. TURKEN:** Nope.

24 **COMMISSIONER JOHNSON:** BellSouth?

25 **MR. CARVER:** No, ma'am.

1 **COMMISSIONER JOHNSON:** Staff has no position
2 at this time.

3 Page 7 then, Issue and Positions. Issue 1,
4 any changes?

5 **MR. TURKEN:** The only change that Access One
6 has, I think, is typographical. If you go down where
7 it starts the quote, the quote is only suppose to be
8 the first paragraph. Where it says, "even if
9 BellSouth was somehow correct," that's suppose to go
10 back out to the margin and that continues over to the
11 next page.

12 **COMMISSIONER JOHNSON:** Okay. We'll reflect
13 that change.

14 **MR. TURKEN:** I don't think it was ever
15 intended by the Staff to be part of the quote.

16 **COMMISSIONER JOHNSON:** Sure. Sure. Okay.
17 Any other changes, Access One?

18 **MR. TURKEN:** No.

19 **COMMISSIONER JOHNSON:** BellSouth?

20 **MR. CARVER:** No changes.

21 **COMMISSIONER JOHNSON:** Staff has no
22 position.

23 Issue 2. Any changes, Access One?

24 **MR. TURKEN:** No.

25 **COMMISSIONER JOHNSON:** BellSouth?

1 **MR. CARVER:** No changes.

2 **COMMISSIONER JOHNSON:** And Staff there is
3 fine.

4 Issue 3. Access One?

5 **MR. TURKEN:** No.

6 **COMMISSIONER JOHNSON:** BellSouth?

7 **MR. CARVER:** No.

8 **COMMISSIONER JOHNSON:** Okay. And on Page
9 15, Issue 4 there, we will show the stipulated
10 language.

11 Issue 5. Access One?

12 **MR. TURKEN:** No.

13 **COMMISSIONER JOHNSON:** BellSouth?

14 **MR. CARVER:** No changes.

15 **COMMISSIONER JOHNSON:** Staff is fine.

16 We're now, gentlemen and ladies, on Page 17,
17 the exhibit list. Any changes, corrections or
18 additions?

19 **MR. TURKEN:** Well, we have a change on
20 Page 16 actually.

21 **COMMISSIONER JOHNSON:** Oh, okay. Let's go
22 back then to Page 16.

23 **MR. TURKEN:** On our copy, it's the beginning
24 of the exhibit list. This is Robert Turken.

25 It appears inadvertently that Exhibit KB-5

1 was omitted and what is listed as Exhibit KB-5 is
2 really Exhibit KB-6. KB-5 is a letter from Page
3 Miller to Ken Baritz dated September 11, 1998.

4 **MR. COX:** I'm sorry. Could you repeat KB-5,
5 please?

6 **MR. TURKEN:** KB-5 should be a letter from
7 Page Miller to Ken Baritz dated September 11, 1998.

8 **MR. COX:** Okay.

9 **MR. TURKEN:** What is currently listed as
10 Exhibit KB-5 should be denominated as Exhibit KB-6.

11 And then when you go over to Page 17 it
12 starts off correctly again because it starts off with
13 Exhibit KB-7.

14 **COMMISSIONER JOHNSON:** Okay. So, KB --
15 because my pagination is different here. KB-5 should
16 be a letter from Page Miller to Ken --

17 **MR. TURKEN:** Baritz. B-A-R-I-T-Z.

18 **COMMISSIONER JOHNSON:** Dated September 11th?

19 **MR. TURKEN:** September 11, '98.

20 **COMMISSIONER JOHNSON:** '98.

21 **MR. TURKEN:** And then what is identified as
22 KB-6 -- correctly identified KB-5, just should be
23 KB-6.

24 **COMMISSIONER JOHNSON:** I'm following you.
25 It's the February 3rd letter?

1 **MR. TURKEN:** Right.

2 **COMMISSIONER JOHNSON:** Got you. Everyone
3 following that change?

4 **MR. COX:** Yes.

5 **MR. TURKEN:** On Page 17 -- well, excuse me,
6 because you have a different pagination. What you
7 have listed as Exhibit KB-9, another typographical
8 error. It says, agreement between BellSouth
9 Telecommunications, Inc. and The Telephone Company of
10 Florida. After the word "of" there should be inserted
11 the word --

12 (Door closing.)

13 **COMMISSIONER JOHNSON:** Okay.

14 **MR. TURKEN:** Should be The Telephone Company
15 of Central Florida.

16 **COMMISSIONER JOHNSON:** Okay. Got you there.

17 **MR. TURKEN:** Okay.

18 **THE REPORTER:** Wait a minute. Would you
19 please repeat the last word of that last statement?

20 **MR. COX:** I'm sorry. Repeat that. The
21 Court reporter didn't get that.

22 **MR. TURKEN:** Exhibit KB-9, the word
23 "central" was missing from The Telephone Company -- it
24 currently reads, "The Telephone Company of Florida."
25 It should read, "The Telephone Company of Central

1 Florida."

2 **COMMISSIONER JOHNSON:** Okay. The record
3 will reflect that revision there, that change,
4 clarification. Anything else Access One?

5 **MR. TURKEN:** Yes. Exhibit KB-10, we would
6 propose that it would -- it currently reads, "letter
7 from Page Miller to Ken Baritz enclosing the BellSouth
8 Standard Resale Agreement." Just for purposes of
9 clarity, we would propose, "letter from Page Miller to
10 Ken Baritz dated July 6, 1998."

11 **COMMISSIONER JOHNSON:** July 6, 1998. Okay.

12 **MR. TURKEN:** And continue on -- and this
13 is -- again, this is just for purposes of clarity. On
14 our Page 19, which may be your Page 20, partly
15 identified as BS-1.

16 **COMMISSIONER JOHNSON:** BS-1, uh-huh.

17 **MR. TURKEN:** And, Will, this is just a
18 proposal, so please, tell me if you agree or disagree.
19 BS-1 currently consists of BellSouth's responses to
20 Access One's First Request for Production. That
21 includes a table prepared by BellSouth, et cetera.

22 What we would propose to do is make BS-1
23 just the response and make BS-2 the table that was
24 produced subsequently by BellSouth pursuant to that
25 response. Because to be fair to BellSouth, they

1 didn't -- it was a subsequent production.

2 **MR. COX:** Okay. That table is different
3 than the table currently listed as --

4 **MR. TURKEN:** No. It's the same table. It's
5 just splitting BS-1 up into BS-1 and BS-2. If you
6 think that's going to create more trouble than it's
7 worth, then forget it.

8 **MR. COX:** What I'm trying to ask, I guess,
9 Mr. Turken, is BS-2 -- the table in BS-2, is that the
10 same table?

11 **MR. TURKEN:** No. I was going to add it --
12 one more BS exhibit.

13 **MR. COX:** Okay. That will be fine.

14 **MR. TURKEN:** Okay. So I would propose, as I
15 said, again, that we make new BS-2 the table that is
16 currently listed as part of BS-1.

17 **MR. COX:** Okay.

18 **MR. TURKEN:** So BS-1 would be BellSouth's
19 Response to Access One's First Request for Production,
20 and BS-2 would be a table prepared by BellSouth in
21 response to Access One's First Request for Production,
22 which identifies all resale agreements entered into by
23 BellSouth that contain provisions similar to the TCCF
24 provision, except that the benefits under the
25 provision are unilateral to BellSouth.

1 **COMMISSIONER JOHNSON:** Any objections to the
2 change there in bifurcating those two? Okay. The
3 record -- or the order will reflect that change.
4 Something else Access One?

5 **MR. TURKEN:** No. I believe -- I have a
6 question. We would obviously have to renumber the
7 subsequent BS-2, 3, 4.

8 **COMMISSIONER JOHNSON:** Sure.

9 **MR. TURKEN:** BS-3, 4 and 5. And this is a
10 question directed to Will Cox. Would you prefer us
11 also to include as part of the BS discovery -- the BS
12 exhibits, BellSouth's response to Access One's Second
13 Request for Production?

14 **MR. COX:** We'd like to see all the
15 information that we can in this proceeding. It would
16 be up to you to offer it, but Staff would prefer to
17 see anything and everything that BellSouth has
18 provided to you.

19 **MR. TURKEN:** Okay. Then why don't we -- why
20 don't I propose that new BS-3 would be BellSouth's
21 response to Access One's Second Request for
22 Production.

23 Then new BS-4 would be a table prepared by
24 BellSouth in response to Access One's Second Request
25 for Production, which identifies all resale agreements

1 entered into by BellSouth that contain a most Favored
2 Nations clause substantially similar to the clause
3 contained in the Access One agreement.

4 Then what is currently identified as BS-3
5 would become BS-5, and what is currently identified as
6 BS-4 would become BS-6.

7 **MR. COX:** That would be fine with Staff.

8 **COMMISSIONER JOHNSON:** Okay. The record
9 will reflect those changes.

10 **MR. TURKEN:** And Access One, I do not
11 believe, has further comments.

12 **COMMISSIONER JOHNSON:** Okay. BellSouth.

13 **MR. CARVER:** We have no changes to our
14 exhibit list.

15 **COMMISSIONER JOHNSON:** Very good. Proposed
16 stipulations, we'll have that added as it relates to
17 Issue 4.

18 Pending motions, I've addressed those.

19 Any other matters to come before me as
20 prehearing officer today?

21 **MR. CARVER:** None for BellSouth.

22 **MR. TURKEN:** None for Access One.

23 **MR. COX:** None for Staff.

24 **COMMISSIONER JOHNSON:** Staff. Thank you.

25 Hearing none then, thank you very much and this

1 prehearing is adjourned.

2 **MR. CARVER:** Thank you.

3 **COMMISSIONER JOHNSON:** Take care. Bye-bye.

4 (Thereupon, the hearing concluded at

5 11:20 a.m.)

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