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August 26, 1999

VIA OVERNIGHT DELIVERY

Blanca S. Bayo
Director, Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RECEIVED
FLORIDA PUBLIC
SERVICE COMMISSION
99 AUG 27 AM 10:07
MAIL ROOM

Re: **IntraLATA Toll Dialing Parity**

Dear Ms. Bayo:

On behalf of DSLnet Communications, LLC ("DSLnet"), the purpose of this letter is to acknowledge that DSLnet is aware of the obligations of local exchange carriers to provide dialing parity to their customers pursuant to 47 U.S.C. § 251(b). Subsequent orders of the Federal Communications Commission ("FCC") require local exchange carriers to file toll-dialing parity plans with each state commission where the carrier is providing local exchange service.

DSLnet was authorized to provide local exchange service in Florida on July 6, 1999 in Docket No. 990163-TX. Presently, DSLnet does not provide any originating services that require dialing to route a call. Initially, DSLnet will offer only high-speed, non-switched Internet and Intranet data connections. These services, which are mileage and usage insensitive, do not incur toll charges, so the concept of toll-dialing parity is inapposite. Furthermore, because none of DSLnet's services require dialing, the FCC's dialing parity regulations are inapplicable.¹

DSLnet has been authorized by the Florida Public Service Commission to provide local exchange voice services. If and when DSLnet determines that it intends to initiate voice services in Florida, DSLnet will implement a dialing parity plan for its voice customers and will file a price list with the Florida Public Service Commission in conformance with all applicable laws and regulations. For your information and records, a sample dialing parity plan for DSLnet is attached hereto.

- AFA _____
- APP _____
- CAF _____
- CMU** _____
- CTR _____
- EAG _____
- LEG _____
- MAS _____
- OPC _____
- PAI _____
- SEC _____
- WAW _____
- OTH _____

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¹ See 47 C.F.R. § 51.205. "Dialing parity shall be provided for all originating telecommunications services that require dialing to route a call."

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If DSLnet receives no response to this letter within thirty days of the date on which it is received by the Florida Public Service Commission, it will assume that it has satisfied its dialing parity obligations for Florida under state and federal law.

An original and one copy of this filing are enclosed. Please date stamp the enclosed extra copy of this filing and return it in the stamped envelope provided. Please do not hesitate to contact me if you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'P. Hudson', written over a horizontal line.

Paul B. Hudson
Counsel for DSLnet Communications, LLC

Enclosure

cc: Wendy Bluemling (*via facsimile*)

**DSLNET COMMUNICATIONS, LLC
INTRALATA TOLL DIALING PARITY PLAN**

INTRODUCTION

DSLnet Communications, LLC ("DSLnet") may implement the following processes which are designed to give end user customers the opportunity to designate a carrier for their intraLATA toll call traffic in those market areas where DSLnet is a facilities-based local exchange service provider. IntraLATA toll calls will automatically be directed to the designated carrier without the customer having to dial an access code.

POLICIES

DSLnet will deploy two-PIC (Primary Interexchange Carrier) technology in its switches enabling customers to pre-subscribe to either the same or two different carrier for their intraLATA and interLATA service.

Appropriate tariffs will be revised and filed in accordance with this plan.

DSLnet will offer customers the ability to access all participating carriers by dialing the appropriate access code (10XXX/101XXXX).

All eligible DSLnet end user telephone line numbers will be pre-subscribed and have a PIC associated with them.

CARRIER INFORMATION

Interexchange carriers will have the option of offering intraLATA service only or intraLATA and interLATA service.

Interexchange carriers will have the option of participating in all market areas or in a specific market area.

Interexchange carriers will be required to return a completed Non-Disclosure Agreement and Participation Agreement(s).

DSLnet will not participate in billing disputes for intraLATA service between an alternative competing interexchange carrier and its customers.

DSLnet representatives will not initiate or accept three-way calls from an alternative interexchange carriers in order to discuss pre-subscription.

Carriers wishing to participate will be requested to submit Access Service Requests/Translation Questionnaires to the Access Tandem owner and to DSLnet.

CALL ELIGIBILITY/TOLL DIALING PLAN

All local service customers of DSLnet will have calls routed according to the following plan:

If a DSLnet Customer Dials:	The Call is Handled By/Routed To:
911	PSAP on originating line number
411/555-1212	DSLnet's Directory Assistance Operator
0-	DSLnet's Operator
0 + intraexchange number	IntraLATA Toll Provider
1 + 7 or 10 digits	IntraLATA Toll Provider
0 + 7 or 10 digits interexchange number	InterLATA Toll Provider
10XXX or 101XXXX + 0-	XXX/XXXX Carrier
10XXX or 101XXXX + 0 + 7 or 10 digits	XXX/XXXX Carrier
10XXX or 101XXXX + 7 or 10 digits	XXX/XXXX Carrier

If a DSLnet customer originates a call to an alternative interexchange carrier's Operator by dialing 00-, the call will be routed to the PIC on that customer's line. If the customer originates a call to an alternative interexchange carrier's Operator by dialing an access code (e.g., 10XXX/101XXXX + 0-), the call will be routed to the XXX/XXXX carrier. In both cases, the carrier's switch is responsible for routing this call to the alternative interexchange carrier's Operator or to an announcement.

NETWORK INFORMATION

All originating intraLATA traffic will initially be routed via the incumbent Local Exchange Carrier (LEC) Access Tandem(s). Following conversion, direct trunks between the DSLnet switch and the interexchange carrier location(s) may be provided when warranted by traffic volume.

Interexchange carriers must have Feature Group D trunks in place (or ordered) between their point of presence and the incumbent LEC Access Tandem(s).

DSLnet will route all originating intraLATA traffic to the designated carrier and will only block traffic at the request of the end user customer and/or in compliance with regulatory requirements. Requests from carriers to block traffic or to remove customers from their network will not be honored. Calls that cannot be completed to a carrier will be routed to an announcement.

CUSTOMER CONTACT INFORMATION

DSLnet customer contact representatives will process customer initiated PIC selections to DSLnet or to an alternative intraLATA carrier. Carriers will have the option of allowing the DSLnet representative to process PIC requests on their behalf.

DSLnet will not ballot or allocate its customer base. At the time of conversion, all customers will be "PIC'd" to DSLnet unless another carrier is chosen by the particular customer.

DSLnet customer contact representatives will respond to customer inquiries about intraLATA carriers in a competitively neutral fashion. If a customer requests information on alternative carriers other than DSLnet, a list of participating carriers will be read to that customer in random order by DSLnet representatives.

If the intraLATA toll carrier selected by the customer permits DSLnet to process orders on its behalf, DSLnet will accept the PIC change request. If the customer selects an intraLATA toll carrier that does not allow DSLnet to process PIC changes on its behalf, DSLnet will provide the customer with the carrier's toll-free number (if provided by the carrier).

DSLnet representatives will not discuss alternative carrier rates or services and will not provide customers with Carrier Identification Codes or access code dialing instructions.

PRE-SUBSCRIPTION INFORMATION

A \$5.00 PIC change charge will be incurred and billed to a DSLnet customer for each eligible line where a PIC change is made. DSLnet will offer its customers a 90-day grace period following the implementation of this plan during which the customers may change intraLATA carriers without incurring a PIC change charge. Customers can make multiple PIC changes during these 90 days at no charge. After the 90-day period, DSLnet will assess the \$5.00 PIC change charge for each PIC change made. DSLnet will offer interexchange carriers the option of having the PIC charge billed to the carrier or directly to the customer.

New line customers, including customers adding lines, will have the opportunity to select a participating carrier, or they will be assigned a NO PIC designation. If a customer cannot decide upon an intraLATA carrier at the time of order, DSLnet may extend a 30-day period following placement of the customer's service order for the customer to select an intraLATA carrier without charge. Such a customer will be assigned a NO PIC designation in the interim. After this 30-day period, DSLnet will assess the \$5.00 PIC change charge as described above. Customers assigned a NO PIC designation as set forth in this paragraph will be required to dial an access code to reach an intraLATA carrier's network.

If a DSLnet customer denies requesting a change in intraLATA toll providers as submitted by an intraLATA carrier, and the intraLATA carrier is unable to produce a Letter of Agency signed by the

customer or some other form of verification that is permitted by law, the intraLATA carrier will be assessed a \$30.00 charge for the unauthorized PIC change and the PIC will be changed as per the customer's request. This penalty is in addition to any other penalties authorized by law.

Alternative interexchange carriers may submit PIC changes to DSLnet via a fax/paper interface.

DSLnet will process intraLATA PIC selections in the same manner and under the same intervals of time as interLATA PIC changes.

Carriers will be required to submit PIC changes using the Customer Account Record Exchange (CARE) format via paper medium. DSLnet will provide carriers with PIC order confirmation and reject information using the CARE format. Specific details regarding CARE will be provided to participating carriers.

For customers who change their local service provider from the incumbent LEC to DSLnet and retain their incumbent LEC telephone number(s), DSLnet, as part of the CARE PIC process, will provide the selected intraLATA carrier with both the retained (incumbent LEC) telephone number and the DSLnet telephone number.

Dated: August 24, 1999