

ORIGINAL

In re: Investigation into pricing of unbundled network elements.

DOCKET NO. 990649-TP

FILED: NOVEMBER 24, 1999

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-99-1397-PCO-TP, issued July 20, 1999, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

None.

b. All Known Exhibits

None.

c. Staff's Statement of Basic Position

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 the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

d. Staff's Position on the Issues

ISSUE 1: Deaveraging of UNEs:

- (a) Which UNEs, excluding combinations, should be deaveraged?
- (b) Which UNE combinations, if any, should be deaveraged?
- (c) What is the appropriate basis for deaveraging UNEs?

AFA
 APP
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 CMU
 CTR
 EAG
 LEG
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- (d) Should the degree of deaveraging be uniform for all UNEs?
- (e) Should the degree of deaveraging be uniform for all affected ILECs for which deaveraged rates are appropriate?
- (f) What other factors or policy considerations, if any, should be considered in determining deaveraged UNE rates?
- (g) What supporting data or documentation should an ILEC provide with its deaveraging filing?

Position:

Staff has no position at this time.

ISSUE 2: How can one determine which UNEs an ILEC "currently combines" (51.315(b)), versus those which are "not ordinarily combined in the incumbent LEC's network" (51.315(c))?

Position:

Staff has no position at this time.

ISSUE 3: Cost Studies:

- (a) What guidelines and specific requirements should be imposed on recurring and nonrecurring cost studies, if any, required to be filed in this proceeding?
- (b) For which UNEs should the ILECs submit cost studies sufficient to deaverage those UNEs identified in Issues 1(a) and 1(b)?

- (c) To the extent not included in Issue 3(b), should the ILECs be required to file recurring cost studies for any remaining UNEs, and combinations thereof, identified by the FCC in its forthcoming order on the Rule 51.319 remand?
- (d) To the extent not included in Issue 3(b), should the ILECs be required to file nonrecurring cost studies for any remaining UNEs, and combinations thereof, identified by the FCC in its forthcoming order on the Rule 51.319 remand?
- (e) When should the cost studies identified in Issues 3(b), (c), and (d) be filed?

Position:

Staff has no position at this time.

e. Pending Motions

Staff's Motion to Accept Late-Filed Prehearing Statement.

f. Pending Confidentiality Claims or Requests

Staff has no pending requests for confidential treatment.

g. Compliance with Order No. PSC-99-1397-PCO-TP

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

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Respectfully submitted this 24TH day of November, 1999.

A handwritten signature in cursive script, appearing to read "Donna M. Clemons", is written over a horizontal line.

DONNA M. CLEMONS

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