

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint and/or petition for arbitration by Global NAPS, Inc. for enforcement of Section VI(B) of its interconnection agreement with BellSouth Telecommunications, Inc., and request for relief.

DOCKET NO. 991267-TP

DATED: DECEMBER 20, 1999

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-99-2155-PCO-TP, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

Staff will not sponsor any witnesses.

b. All Known Exhibits

Staff has not identified any exhibits at this time.

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

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- MAS 3 _____
- OPC _____
- RRR _____
- SEC 1 _____
- WAW _____
- OTH _____

ISSUE 1: Under their Florida Partial Interconnection Agreement, are Global NAPs, Inc. and BellSouth Telecommunications, Inc. Required to compensate each other for delivery of traffic to Internet Service Providers (ISPs)? If so, what action, if any, should be taken?

DOCUMENT NUMBER-DATE

15460 DEC 20 99

FPSC-RECORDS/REPORTING

Position:

STAFF:

Staff takes no position at this time.

ISSUE 2: Is the prevailing party entitled to attorney's fees under the agreement?

Position:

STAFF:

Staff takes no position at this time.

e. Pending Motions

Staff has no pending motions at this time.

f. Pending Confidentiality Claims or Requests

Staff has no pending requests for confidential treatment at this time.

g. Compliance with Order No. PSC-99-2155-PCO-TP

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

Respectfully submitted this _____ day of _____,
_____.



BETH KEATING
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Boulevard
Gerald L. Gunter Building - Room 370
Tallahassee, Florida 32399-0863
(850)413-6199

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint and/or
petition for arbitration by
Global NAPS, Inc. for
enforcement of Section VI(B) of
its interconnection agreement
with BellSouth
Telecommunications, Inc., and
request for relief.

DOCKET NO. 991267-TP

FILED: DECEMBER 20, 1999

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Staff's
Prehearing Statement has been furnished by U.S. Mail this 20th day
of December, 1999, to the following:

Cathy M. Sellers, Esquire
Moyle Law Firm
118 North Gadsden Street
Tallahassee, FL 32301

Christopher W. Savage
Coles Raywid & Braverman LLP
1919 Pennsylvania Avenue NW
Washington, DC 20006

Mr. William J. Rooney
Global NAPS, Inc.
10 Merrymount Road
Quincy, MA 02169

Nancy B. White, Esquire
c/o Ms. Nancy H. Sims
BellSouth Telecommunications,
Inc.
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556



BETH KEATING
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(850) 413-6199