



- b) False traffic deliberately generated for the sole purpose of obtaining increased reciprocal compensation (e.g., Router-Router traffic)?

Position:

Staff takes no position at this time.

ISSUE 3: Should Intermedia be compensated for end office, tandem, and transport elements, for purposes of reciprocal compensation?

Position:

Staff takes no position at this time.

ISSUE 4: Should BellSouth be required to pay for additional transport charges where Intermedia has configured its network in a way that its switch is in a different LATA than Intermedia's end user customer?

Position:

Staff takes no position at this time.

ISSUE 7: What charges should Intermedia pay to BellSouth for space preparation for physical collocation?

Position:

Staff takes no position at this time.

ISSUE 10: Are BellSouth's policies regarding conversion of virtual to physical collocation reasonable?

Position:

Staff takes no position at this time.

ISSUE 12: What is the appropriate definition of "currently combines" pursuant to FCC Rule 51.315(b)?

Position:

Staff takes no position at this time.

ISSUE 13: Should BellSouth be required to:

- a) provide access to enhanced extended links ("EELs") at UNE rates; and
- b) allow Intermedia to convert existing special services to EELs at UNE rates?

Position:

Staff takes no position at this time.

ISSUE 15: Should BellSouth be required to condition loops in accordance with the FCC's most recent ruling?

Position:

Staff takes no position at this time.

ISSUE 17: Should BellSouth be required to offer subloop unbundling and access to BellSouth-owned inside wiring in accordance with the UNE Remand Order and FCC Rule 319(a)?

Position:

Staff takes no position at this time.

ISSUE 18: Should BellSouth be required to provide access on an unbundled basis in accordance with, and as defined in, the FCC's UNE Remand Order to packet switching capabilities?

Position:

Staff takes no position at this time.

ISSUE 22: Should BellSouth be required to provide non-discriminatory access to interoffice transmission facilities in accordance with, and as defined in, the FCC's UNE Remand Order?

Position:

Staff takes no position at this time.

ISSUE 25: Should BellSouth be required to furnish access to the following as UNEs: (i) User to Network Interface ("UNI"); (ii) Network-to-Network Interface ("NNI") and (iii) Data Link Control Identifiers ("DLCI"), at Intermedia-specified committed information rates ("CIR")?

Position:

Staff takes no position at this time.

ISSUE 26: Should parties be allowed to establish their own local calling areas and assign numbers for local use anywhere within such areas, consistent with applicable law?

Position:

Staff takes no position at this time.

ISSUE 27: Should Intermedia be permitted to establish Points of Presence ("POP") and Points of Interface ("POI") for delivery of its originated interLATA toll traffic?

Position:

Staff takes no position at this time.

ISSUE 29: In the event Intermedia chooses multiple tandem access ("MTA"), must Intermedia establish points of interconnection at all BellSouth access tandems where Intermedia's NXXs are "homed"?

Position:

Staff takes no position at this time.

ISSUE 30: Should Intermedia be require to:

- a) designate a "home" local tandem for each assigned NPA/NXX; and
- b) establish points of interconnection to BellSouth access tandems within the LATA on which Intermedia has NPA/NXXs homed?

Position:

Staff takes no position at this time.

ISSUE 31: For purposes of compensation, how should intraLATA Toll Traffic be defined?

Position:

Staff takes no position at this time.

ISSUE 32: How should "Switched Access Traffic" be defined?

Position:

Staff takes no position at this time.

ISSUE 35: How should Wireless Type I and/or Type 2A traffic be treated for purposes of the parties' interconnection agreement?

Position:

Staff takes no position at this time.

ISSUE 36: What should the appropriate compensation mechanism for transit traffic be for purposes of the parties' interconnection agreement?

Position:

Staff takes no position at this time.

ISSUE 37: Should all framed packet data transported within a Virtual Circuit that originate and terminate within a LATA be classified as local traffic?

Position:

Staff takes no position at this time.

ISSUE 38: If there are no Virtual Circuits on a frame relay interconnection facility when it is billed, should the parties deem the Percent Local Circuit Use to be zero?

Position:

Staff takes no position at this time.

ISSUE 39: What are the appropriate charges for the following:

- a) interconnection trunks between the parties' frame relay switches,
- b) frame relay network-to-network interface ("NNI") parts,
- c) permanent virtual circuit ("PVC") segment (i.e., Data Link Connection Identifier ("DLCI") and Committed Information Rates ("CIR")), and
- d) requests to change a PVC segment or PVC service order record.

Position:

Staff takes no position at this time.

ISSUE 45: Should the interconnection agreement specifically state that the agreement does not address or alter either party's provision of Exchange Access Frame Relay Service or interLATA Frame Relay Service?

Position:

Staff takes no position at this time.

ISSUE 46: Should Intermedia's obligation to identify and report quarterly to BellSouth the PLCU of the Frame Relay facilities it uses cease when BellSouth obtains authority to provide in-region interLATA service?

Position:

Staff takes no position at this time.

e. Pending Motions

None.

f. Pending Confidentiality Claims or Requests

None.

g. Compliance with Order No. PSC-00-0284-PCO-TP.

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

Respectfully submitted this 3rd day of March, 2000.



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Staff Counsel

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of BellSouth  
Telecommunications, Inc. for  
Section 252(b) arbitration of  
interconnection agreement with  
Intermedia Communications, Inc.

DOCKET NO. 991854-TP

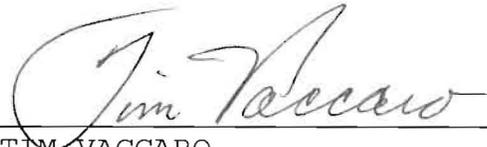
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of Staff's Prehearing Statement  
has been furnished by U.S. Mail this 3rd day of March, 2000, to the  
following:

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