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RECORDS AND REPORTING

June 26, 2000

ORIGINAL

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 990649-TP

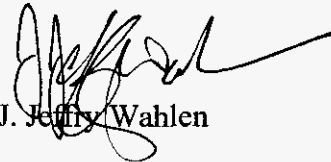
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of ALLTEL's Phase I Prehearing Statement.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,


J. Jeffrey Wahlen

Enclosures

- APP _____
 - CAF _____
 - CMP
 - COM
 - CTR _____
 - ECR _____
 - LEG
 - OPC _____
 - PAI _____
 - RGO _____
 - SEC
 - SER _____
 - OTH _____
- cc: All Parties of Record

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07744 JUN 26 8

FPSC-RECORDS/REPORTING

ORIGINAL

In re: Investigation into
pricing of unbundled network
elements

DOCKET NO. 990649-TP
FILED: 6/26/00

ALLTEL'S PHASE I PREHEARING STATEMENT

ALLTEL Communications, Inc. ("ALLTEL" or the "Company"), pursuant to Order No. PSC-00-2015-TP, submits the following Phase I Prehearing Statement.

A. **WITNESS:** ALLTEL did not prefile testimony for Phase I of this proceeding, but reserves the right to participate in the hearing by cross-examination.

B. **EXHIBITS:** ALLTEL did not prefile any exhibits, but reserves the right to use exhibits submitted by others during cross-examination.

C. **BASIC POSITION:**

Phase I of this proceeding addresses a small number of discrete issues. Throughout this proceeding, the Commission should follow the following basic principles: (1) only ILECs with approved agreements to provide UNEs should be required to deaverage UNEs; (2) for those ILECs, UNEs should be deaveraged where significant cost differences exist into at least three zones; (3) where there are no significant cost differences, no geographic deaveraging should be required; (4) forward looking costs should be used to determine whether significant cost differences exist and (5) the Commission's final order in this docket should make it clear that rural companies retain their right under Section 251(f)(2) to seek a modification of the deaveraging requirements established in this proceeding under the standard in Section 251(f)(2).

DOCUMENT NUMBER-DATE
07744 JUN 26 8
FPSC-RECORDS/REPORTING

D-G. ISSUES AND POSITIONS:

Issue 5: For which signaling networks and call-related databases should rates be set?

Position: No position at this time.

Issue 6: Under what circumstances, if any, is it appropriate to recover non-recurring costs through recurring rates?

Position: As a general rule, non-recurring costs should be recovered through non-recurring rates.

Issue 7: What are the appropriate assumptions and inputs for the following items to be used in the forward-looking recurring UNE cost studies?

b) depreciation;

c) cost of capital;

d) tax rates.

Position: No position at this time.

Issue 9(b): Subject to the standards of the FCC's Third Report and Order, should the Commission require ILECs to unbundle any other elements or combinations of elements? If so, what are they and how should they be priced?

Position: This proceeding does not address the pricing of two network elements the Federal Communications Commission determined should be unbundled; i.e., "line sharing" and Operational Support Systems. These two network elements will be addresses in separate proceedings.

Issue 13: **When should the recurring and non-recurring rates and charges take effect?**


Position: No position at this time.

H. STIPULATIONS: The Company is not aware of any pending stipulations at this time.

I. PENDING MOTIONS: ALLTEL is not aware of any pending motions at this time.

J. COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE:
ALLTEL does not know of any requirement of the Order on Prehearing Procedure with which it cannot comply.

Respectfully submitted this 26th day of June, 2000.



J. JEFFRY WALLEN
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ATTORNEYS FOR ALLTEL
COMMUNICATIONS, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail transmission, U. S. Mail, or hand delivery (*) this 26th day of June 2000, to the following:

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