

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network elements.

DOCKET NO. 990649-TP
DATED: AUGUST 22, 2000

STAFF'S REVISED PREHEARING STATEMENT

Pursuant to Orders Nos. PSC-00-2015-PCO-TP and PSC-00-0540-PCO-TP, the Staff of the Florida Public Service Commission files its Revised Prehearing Statement to conform our Prehearing Statement filed August 21, 2000, with the issues to be addressed in this portion of the proceeding.

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: What factors should the Commission consider in establishing rates and charges for UNEs (including deaveraged UNEs and UNE combinations)?

STAFF: Staff has no position at this time.

Issue 2: (a) What is the appropriate methodology to deaverage UNEs and what is the appropriate rate structure for deaveraged UNEs?

STAFF: Staff has no position at this time.

(b) For which of the following UNEs should the Commission set deaveraged rates?

- APP _____
- CAF _____
- CMP _____
- COM 5 _____
- CTR _____
- ECR _____
- LEG _____
- OPC _____
- PAI _____
- RGO _____
- SEC 1 _____
- SER _____
- OTH _____

DOCUMENT NUMBER-DATE

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- (1) loops (all);
- (2) local switching;
- (3) interoffice transport
(dedicated and shared);
- (4) other (including combinations).

STAFF: Staff has no position at this time.

- Issue 3:**
- (a) What are xDSL capable loops?
 - (b) Should a cost study for xDSL-capable loops make distinctions based on loop length and/or the particular DSL technology to be deployed?

STAFF: Staff has no position at this time.

- Issue 4:**
- (a) Which subloop elements, if any, should be unbundled in this proceeding, and how should prices be set?

STAFF: Staff has no position at this time.

- (b) How should access to such subloop elements be provided, and how should prices be set?

STAFF: Staff has no position at this time.

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

- (a) network design (including customer location assumptions);
- (e) structure sharing;
- (f) structure costs;
- (g) fill factors;
- (h) manholes;
- (i) fiber cable (material and placement costs);
- (j) copper cable (material and placement costs);
- (k) drops;
- (l) network interface devices;
- (m) digital loop carrier costs;

- (n) terminal costs;
- (o) switching costs and associated variables;
- (p) traffic data;
- (q) signaling system costs;
- (r) transport system costs and associated variables;
- (s) loadings;
- (t) expenses;
- (u) common costs;
- (v) other.

STAFF: Staff has no position at this time.

Issue 8: What are the appropriate assumptions and inputs for the following items to be used in the forward-looking non-recurring UNE cost studies?

- (a) network design;
- (b) OSS design;
- (c) labor rates;
- (d) required activities;
- (e) mix of manual versus electronic activities;
- (f) other.

STAFF: Staff has no position at this time.

Issue 9: (a) What are the appropriate recurring rates (averaged or deaveraged as the case may be) and non-recurring charges for each of the following UNEs?

- (1) 2-wire voice grade loop;
- (2) 4-wire analog loop;
- (3) 2-wire ISDN/IDSL loop;
- (4) 2-wire xDSL-capable loop;
- (5) 4-wire xDSL-capable loop;
- (6) 4-wire 56 kbps loop;
- (7) 4-wire 64 kbps loop;
- (8) DS-1 loop;
- (9) high capacity loops (DS3 and above);
- (10) dark fiber loop;
- (11) subloop elements (to the extent required by the Commission in Issue 4);

- (12) network interface devices;
- (13) circuit switching (where required);
- (14) packet switching (where required);
- (15) shared interoffice transmission;
- (16) dedicated interoffice transmission;
- (17) dark fiber interoffice facilities;
- (18) signaling networks and call-related databases;
- (19) OS/DA (where required).

STAFF: Staff has no position at this time.

Issue 10: What is the appropriate rate, if any, for customized routing?

STAFF: Staff has no position at this time.

Issue 11: What is the appropriate rate if any, for line conditioning, and in what situations should the rate apply?

STAFF: Staff has no position at this time.

Issue 12: Without deciding the situations in which such combinations are required, what are the appropriate recurring and non-recurring rates for the following UNE combinations:

- (a) "UNE platform" consisting of: loop (all), local (including packet, where required) switching (with signaling), and dedicated and shared transport (through and including local termination);
- (b) "extended links," consisting of:

- (1) loop, DSO/1 multiplexing, DS1 interoffice transport;
- (2) DS1 loop, DS1 interoffice transport;
- (3) DS1 loop, DS1/3 multiplexing, DS3 interoffice transport.

STAFF: Staff has no position at this time.

e. Pending Motions

None.

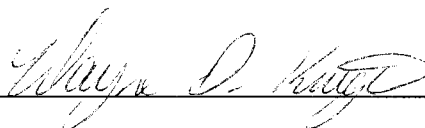
f. Pending Confidentiality Claims or Requests

None.

g. Compliance with Orders Nos. PSC-00-2015-PCO-TP and PSC-00-0540-PCO-TP.

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

Respectfully submitted this 22nd day of August, 2000.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Staff's Revised Prehearing Statement, has been furnished by U.S. Mail, this 22nd day of August, 2000, to the following:

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