

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of
BellSouth Telecommunications,
Inc.'s entry into interLATA
services pursuant to Section 271
of the Federal
Telecommunications Act of 1996.

DOCKET NO. 960786-TL
DATED: SEPTEMBER 10, 2001

STAFF'S PREHEARING STATEMENT

Pursuant to Order Nos. PSC-01-0832-PCO-TL and PSC-01-1025-PCO-TL, 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: Has BellSouth met the requirements of Section 271(c)(1)(A) of the Telecommunications Act of 1996?

- (a) Has BellSouth entered into one or more binding agreements approved under Section 252 with unaffiliated competing providers of telephone exchange service?

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- (b) Does BellSouth currently provide access and interconnection to its network facilities for the network facilities of competing providers?
- (c) Are such competing providers providing telephone exchange service to residential and business customers either exclusively over their own telephone exchange service facilities or predominantly over their own telephone exchange service facilities?

Position

STAFF: Staff has no position at this time.

ISSUE 2: Does BellSouth currently provide interconnection in accordance with the requirements of Sections 251(c)(2) and 252(d)(1) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(i) and applicable rules promulgated by the FCC?

- (a) Has BellSouth implemented physical collocation requests in Florida consistent with FCC rules and orders?
- (b) Does BellSouth have legally binding provisioning intervals for physical collocation?
- (c) Does BellSouth currently provide local tandem interconnection to ALECs?
- (d) Does BellSouth currently permit the use of a Percent Local Usage (PLU) factor in conjunction with trunking?
- (e) Does BellSouth currently provide ALECs with meet point billing data?
- (f) Has BellSouth satisfied other associated requirements, if any, for this item?

Position

STAFF: Staff has no position at this time.

ISSUE 3: Does BellSouth currently provide nondiscriminatory access to all required network elements, with the exception of OSS which will be handled in the third party OSS test, in accordance with Sections 251(c)(3) and 252(d)(1) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(ii) and applicable rules promulgated by the FCC?

(a) Does BellSouth currently provide all required unbundled network elements at TELRIC-based prices?

(b) Has BellSouth satisfied other associated requirements, if any, for this item?

Position

STAFF: Staff has no position at this time.

ISSUE 4: In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 224 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(iii). Does BellSouth currently provide nondiscriminatory access to the poles, ducts, and conduits, and rights-of-way owned or controlled by BellSouth at just and reasonable rates in accordance with the requirements of Section 224 of the Communications Act of 1934 as amended by the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(iii) and applicable rules promulgated by the FCC?

Position

STAFF: Staff has no position at this time.

ISSUE 5: In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(iv) of the Telecommunications Act

of 1996. Does BellSouth currently provide unbundled local loop transmission between the central office and the customer's premises from local switching or other services, pursuant to Section 271(c)(2)(B)(iv) and applicable rules and orders promulgated by the FCC?

- (a) Does BellSouth currently provide all currently required forms of unbundled loops?
- (b) Has BellSouth satisfied other associated requirements, if any, for this item?

Position

STAFF: Staff has no position at this time.

ISSUE 6: Does BellSouth currently provide unbundled local transport on the trunk side of a wireline local exchange carrier switch from switching or other services, pursuant to Section 271(c)(2)(B)(v) and applicable rules promulgated by the FCC?

- (a) Does BellSouth currently provide billing for usage-sensitive UNES?
- (b) Has BellSouth satisfied all other associated requirements, if any, for this item?

Position

STAFF: Staff has no position at this time.

ISSUE 7: Does BellSouth currently provide unbundled local switching from transport, local loop transmission, or other services, pursuant to Section 271(c)(2)(B)(vi) and applicable rules promulgated by the FCC?

- (a) Does BellSouth bill for unbundled local switching on a usage-sensitive basis?

- (b) Does BellSouth currently provide unbundled local switching on both the line-side and the trunk-side of the switch?
- (c) Has BellSouth satisfied other associated requirements, if any, for this item?

Position

STAFF: Staff has no position at this time.

ISSUE 8: Does BellSouth currently provide nondiscriminatory access to the following, pursuant to Section 271(c)(2)(B)(vii) and applicable rules promulgated by the FCC:

- (i) 911 and E911 services;
- (ii) directory assistance services to allow other telecommunications carrier's customers to obtain telephone numbers; and
- (iii) operator call completion services?
- (a) Does BellSouth currently provide ALECs access to all information contained in BellSouth's directory listing database?
- (b) Does BellSouth currently provide selective routing in Florida?
- (c) Has BellSouth satisfied other associated requirements, if any, for this item?

Position

STAFF: Staff has no position at this time.

ISSUE 9: In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(viii) of the Communications Act of 1934, as amended by the Telecommunications Act of

1996. Does BellSouth currently provide white pages directory listings for customers of other telecommunications carrier's telephone exchange service, pursuant to Section 271(c)(2)(B)(viii) and applicable rules promulgated by the FCC?

Position

STAFF: Staff has no position at this time.

ISSUE 10: In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(ix) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide nondiscriminatory access to telephone numbers for assignment to the other telecommunications carrier's telephone exchange service customers, pursuant to Section 271(c)(2)(B)(ix) and applicable rules promulgated by the FCC?

Position

STAFF: Staff has no position at this time.

ISSUE 11: In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(x) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide nondiscriminatory access to databases and associated signaling necessary for call routing and completion, pursuant to Section 271(c)(2)(B)(x) and applicable rules promulgated by the FCC?

Position

STAFF: Staff has no position at this time.

ISSUE 12: In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(x) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996.

Does BellSouth currently provide nondiscriminatory access to databases and associated signaling necessary for call routing and completion, pursuant to Section 271(c)(2)(B)(x) and applicable rules promulgated by the FCC?

Position

STAFF: Staff has no position at this time.

ISSUE 13: In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(xii) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of Section 271(c)(2)(B)(xii) and applicable rules promulgated by the FCC?

Position

STAFF: Staff has no position at this time.

ISSUE 14: In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(xiii) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide reciprocal compensation arrangements in accordance with the requirements of Section 252(d)(2) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(xiii) and applicable rules promulgated by the FCC?

Position

STAFF: Staff has no position at this time.

ISSUE 15: Does BellSouth currently provide telecommunications services available for resale in accordance with the

requirements of Sections 251(c)(4) and 252(d)(3) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(xiv) and applicable rules promulgated by the FCC?

Position

STAFF: Staff has no position at this time.

ISSUE 16: By what date does BellSouth propose to provide intraLATA toll dialing parity throughout Florida pursuant to Section 271(e)(2)(A) of the Telecommunications Act of 1996?

Position

STAFF: Staff has no position at this time.

ISSUE 17: If the answers to issues 2 through 15 are "yes," have those requirements been met in a single agreement or through a combination of agreements?

Position

STAFF: Staff has no position at this time.

ISSUE 18: Should this docket be closed?

Position

STAFF: Staff has no position at this time.

e. Pending Motions

While staff has no pending motions at this time, staff has submitted a recommendation that certain testimony filed in this Docket should either be removed to the Third Party OSS testing phase, or should be stricken.


f. Pending Confidentiality Claims or Requests

None.

g. Compliance with Order Nos. PSC-01-0832-PCO-TL and PSC-01-1025-PCO-TL

Staff has complied with all requirements of the Order on Status Conference and Updating Procedure, as well as the Order Regarding Issues to Be Addressed at Hearing, entered in this docket.

Respectfully submitted this 10th day of September,
2001.


BETH KEATING, Staff Counsel

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