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September 10, 2001

BY HAND DELIVERY

Blanca Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket No. 960786-TL

Dear Ms. Bayó:

Enclosed for filing on behalf of WorldCom, Inc. and its operating subsidiaries are the original and fifteen copies of its Prehearing Statement. Also enclosed is a diskette containing this document in Word 97 format.

By copy of this letter, this document has been furnished to the parties on the attached service list.

If you have any questions regarding this filing, please give me a call at 425-2313.

Very truly yours,



Richard D. Melson

RDM/mee
Enclosure
cc: Certificate of Service

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of)
BellSouth Telecommunications,) Docket No. 960786-TL
Inc.'s entry into interLATA)
services pursuant to Section 271)
of the Federal) Filed: September 10, 2001
Telecommunications Act of 1996.)
_____)

WORLDCOM'S PREHEARING STATEMENT

WorldCom, Inc. and its operating subsidiaries (WorldCom), pursuant to Order No. PSC-01-0832-PCO-TL, hereby files its Prehearing Statement.

A. APPEARANCES:

DONNA CANZANO MCNULTY, WorldCom, Inc., 325 John Knox Road, The Atrium, Suite 105, Tallahassee, FL 32303;

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DULANEY L. O'ROARK III, WorldCom, Inc., Concourse Corporate Center Six, Six Concourse Parkway, Suite 3200, Atlanta, GA 30328,

on behalf of WorldCom, Inc. and its operating subsidiaries.

B. WITNESSES:

WorldCom intends to present the testimony of the following witnesses:

<u>Witness</u>	<u>Testimony</u>	<u>Issues</u>
Mark Argenbright	Rebuttal	2, 6, 14
Greg Darnell	Rebuttal	3

C. EXHIBITS:

WorldCom intends to offer the following exhibits. WorldCom reserves the right to use additional exhibits for purposes of cross-examination.

<u>Witness</u>	<u>Exhibit</u>	<u>Description</u>
Greg Darnell	Exhibit _____ (GJD-1)	Professional Experience

D. STATEMENT OF BASIC POSITION:

Before BellSouth can obtain authority to enter the interLATA market in Florida, it must demonstrate that its local exchange market has been irreversibly opened to competition. To do so, BellSouth must prove compliance with Track A of Section 271(c)(1) of the Telecommunications Act of 1996 (the "Act") and must prove compliance with the fourteen point checklist in Section 271 (c)(2)(B). BellSouth has failed to submit the required proof in this proceeding. There are at least four major areas in which BellSouth has failed to make the required showing.

First, BellSouth does not offer unbundled network elements at prices that comply with TELRIC requirements. Among other things, BellSouth to date has not provided this Commission with cost studies based on a single network design as required by the FCC's TELRIC-pricing rules. Coupled with other flaws in BellSouth's cost methodology, the result is that BellSouth charges UNE rates which make it impossible for competitors to profitably enter the Florida local residential market on a widespread basis.

Second, BellSouth has failed to provide interconnection in accordance with the requirements of the Act by, among other things, seeking to impose on ALECs the financial responsibility for transporting originating traffic from BellSouth's customers to an ALEC's single point of interconnection in a LATA.

Third, BellSouth fails to provide unbundled local transport as required by the Act and

FCC rules. In particular, it refuses to provide unbundled transport between two points on an ALEC's network, or between the networks of two different ALECs, even where the facilities to provide such transport are in existence today.

Fourth, BellSouth fails to provide reciprocal compensation in accordance with the Act. To date, BellSouth has not paid reciprocal compensation at the applicable tandem interconnection rate to ALECs whose switches serve geographic areas comparable to those served by a BellSouth tandem. BellSouth is also resisting payment of reciprocal compensation for calls to ALEC customers who purchase a competitive FX service from the ALEC.

WorldCom understands that the Commission has bifurcated this 271 proceeding, and intends to deal with OSS issues through the independent third party test and an accompanying workshop process. Nevertheless, the provision of adequate OSS is a prerequisite to a determination of compliance with many checklist items, since most items require nondiscriminatory access to preordering, ordering, provisioning, maintenance and billing OSS for the related element or service. Based on commercial experience in Georgia, WorldCom will demonstrate in the OSS phase of this docket that BellSouth's OSS, which is the same nationwide, is not adequate to support competitive entry on a mass market basis. Until the Commission has heard this evidence, and the third party test and related proceedings are complete, the Commission cannot make a final determination that BellSouth has proved compliance with the checklist items that depend on adequate OSS. The order issued in this phase of the docket should therefore clearly state that any findings of checklist compliance are preliminary and conditional, and remain subject to modification based on the results of the OSS phase of the proceeding.

E. STATEMENT OF ISSUES AND POSITIONS:

ISSUE 1: Has BellSouth met the requirements of Section 271(c)(1)(A) of the Telecommunications Act of 1996?

WorldCom: Adopt Joint ALEC position.

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

WorldCom: Adopt Joint ALEC position.

(b) Does BellSouth currently provide access and interconnection to its network facilities for the network facilities of competing providers?

WorldCom: Adopt Joint ALEC position.

(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?

WorldCom: Adopt Joint ALEC position.

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?

WorldCom: No, for the reasons set forth in the subissues. In addition, the Commission cannot make a final determination regarding BellSouth's compliance with this checklist item until conclusion of the OSS phase of this proceeding.

(a) Has BellSouth implemented physical collocation requests in Florida consistent with FCC rules and orders?

WorldCom: Adopt Joint ALEC position.

(b) Does BellSouth have legally binding provisioning intervals for physical collocation?

WorldCom: Adopt Joint ALEC position.

(c) Does BellSouth currently provide local tandem interconnection to ALECs?

WorldCom: Adopt Joint ALEC position.

(d) Does BellSouth currently permit the use of a Percent Local Usage (PLU) factor in conjunction with trunking?

WorldCom: Adopt Joint ALEC position.

(e) Does BellSouth currently provide ALECs with meet point billing data?

WorldCom: Adopt Joint ALEC position.

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

WorldCom: No. Among other things, BellSouth (i) improperly seeks to impose on ALECs financial responsibility for transporting traffic that originates from other BellSouth local calling areas within a LATA to the ALEC's single point of interconnection in the LATA; (ii) improperly requires ALECs to establish inefficient interconnection trunking arrangements which unnecessarily separate local, intraLATA and transit traffic onto separate trunk groups; and (iii) improperly prohibits ALECs from providing competing access service by requiring ALECs to route access traffic to BellSouth end offices over the same trunk groups used to terminate local traffic.

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?

WorldCom: No, for the reasons set forth in the subissues. In addition, the Commission cannot make a final determination regarding BellSouth's compliance with this checklist item until conclusion of the OSS phase of this proceeding.

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

WorldCom: No. BellSouth does not provide unbundled network elements at TELRIC-based rates in compliance with the Act and applicable FCC rules. Among other things, the cost studies submitted by BellSouth in the UNE cost docket and in this proceeding (i) are improperly based on a multiple network design, rather than a single network design, and thereby do not properly reflect economies of scale and scope; (ii) employ loading factors which are based on embedded costs and improperly state the cost of UNEs, particularly in a deaveraged loop environment, (iii) overstate drop lengths and therefore overstate loop costs; and (iv) improperly allocate shared costs on a basis that adversely impacts competition. The resulting

rates make it impossible for competitors to enter the Florida local residential market on a widespread basis. In fact, the evidence will show that BellSouth could not operate profitably at the rates it charges ALECs for UNEs.

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

WorldCom: Adopt Joint ALEC position.

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?

WorldCom: Adopt Joint ALEC position.

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?

WorldCom: Adopt Joint ALEC position. In addition, the Commission cannot make a final determination regarding BellSouth's compliance with this checklist item until conclusion of the OSS phase of this proceeding.

- (a) Does BellSouth currently provide all currently required forms of unbundled loops?

WorldCom: Adopt Joint ALEC position.

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

WorldCom: Adopt Joint ALEC position.

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?

WorldCom: No, for the reasons set forth in the subissues. In addition, the Commission cannot make a final determination regarding BellSouth's compliance with this checklist item until conclusion of the OSS phase of this proceeding

(a) Does BellSouth currently provide billing for usage-sensitive UNEs?

WorldCom: Adopt Joint ALEC position.

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

WorldCom: No. Among other things, BellSouth does not provide unbundled local transport that connects two points on an ALEC's network or that connects a point on an ALEC's network to a point on the network of a different ALEC, even where the facilities to provide such UNEs are currently in place.

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?

WorldCom: Adopt Joint ALEC position. In addition, the Commission cannot make a final determination regarding BellSouth's compliance with this checklist item until conclusion of the OSS phase of this proceeding.

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

WorldCom: Adopt Joint ALEC position.

(b) Does BellSouth currently provide unbundled local switching on both the line-side and the trunk-side of the switch?

WorldCom: Adopt Joint ALEC position.

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

WorldCom: 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

WorldCom: Adopt Joint ALEC position. In addition, the Commission cannot make a final determination regarding BellSouth's compliance with this checklist item until conclusion of the OSS phase of this proceeding.

- (iii) operator call completion services?

WorldCom: Adopt Joint ALEC position. In addition, the Commission cannot make a final determination regarding BellSouth's compliance with this checklist item until conclusion of the OSS phase of this proceeding.

(a) Does BellSouth currently provide ALECs access to all information contained in BellSouth's directory listing database?

WorldCom: Adopt Joint ALEC position.

(b) Does BellSouth currently provide selective routing in Florida?

WorldCom: Adopt Joint ALEC position.

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

WorldCom: Adopt Joint ALEC position.

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?

WorldCom: Adopt Joint ALEC position.

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?

WorldCom: Adopt Joint ALEC position.

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?

WorldCom: Adopt Joint ALEC position.

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)(xi) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide number portability, pursuant to Section 271(c)(2)(B)(xi) and applicable rules promulgated by the FCC?

WorldCom: Adopt Joint ALEC position. In addition, the Commission cannot make a final determination regarding BellSouth's compliance with this checklist item until conclusion of the OSS phase of this proceeding.

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?

WorldCom: Adopt Joint ALEC position.

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?

WorldCom: No. To date, BellSouth has not paid compensation at the tandem interconnection rate to ALEC's whose switches serve areas that are geographically comparable to the area served by BellSouth local tandems. In addition, BellSouth has not agreed to pay reciprocal compensation in situations in which an ALEC provides competitive foreign exchange service by assigning NXXs to a customer with a physical location outside the rate center in which the NXX is homed.

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?

WorldCom: Adopt Joint ALEC position. In addition, the Commission cannot make a final determination regarding BellSouth's compliance with this checklist item until conclusion of the OSS phase of this proceeding

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?

WorldCom: Adopt Joint ALEC position.

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?

WorldCom: Adopt Joint ALEC position.

ISSUE 18: Should this docket be closed?

WorldCom: Adopt Joint ALEC position.

F. STIPULATED ISSUES:

WorldCom is not a party to any stipulation.

G. PENDING MOTIONS:

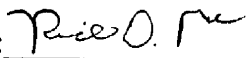
WorldCom has no pending motions.

H. OTHER MATTERS:

WorldCom has no other matters to bring to the Prehearing Officer's attention at this time.

RESPECTFULLY SUBMITTED this 10th day of September, 2001.

HOPPING GREEN SAMS & SMITH, P.A.

By: 

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by hand delivery (*) or by U.S. Mail to the following parties this 10th day of September, 2001.

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