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COMMISSION
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March 1, 2002

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

Re: Docket No. 000075-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of the Prehearing Statement filed on behalf of ALLTEL Florida, Inc. We are also submitting the Prehearing Statement on a 3.5" high-density diskette using Microsoft Word 97 format, Rich Text.

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.

- AUS _____
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- GCL _____
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- MMS _____
- SEC 1 _____
- OTH _____

Enclosures

Sincerely,

J. Jeffrey Wahlen

cc: All Parties of Record

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M. Sockard
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
03611 MAR 29 02
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate methods
to compensate carriers for exchange of
traffic subject to Section 251 of the Telecom-
munications Act of 1996

DOCKET NO. 000075-TP
FILED: 03/29/02

ALLTEL'S PREHEARING STATEMENT

ALLTEL Florida, Inc. ("ALLTEL" or the "Company"), pursuant to Order No. PSC-02-0139-PCO-TP, submits the following Prehearing Statement:

- A. **WITNESS:** The Company will sponsor the direct testimony of Alfred Busbee.
- B. **EXHIBITS:** The Company's witness, Alfred Busbee, has no exhibits.
- C. **BASIC POSITION:**

The local calling area for the purposes of reciprocal compensation should be defined as the retail local calling area of the ILEC. Neither the Florida Commission nor interconnecting companies have statutory authority to redefine or alter the ILEC's "local calling areas" for the purpose of determining the applicability of reciprocal compensation, especially to the extent it would change the jurisdictional separation of access and local traffic and alter the current amount of access charges to which the ILEC would otherwise be entitled.

D-G. ISSUES AND POSITIONS:

Issue 13: How should a "local calling area" be defined, for purposes of determining the applicability of reciprocal compensation?

- a) **What is the Commission's jurisdiction in this matter?**

- b) **Should the Commission establish a default definition of local calling area for the purpose of intercarrier compensation, to apply in the event parties cannot reach a negotiated agreement?**
- c) **If so, should the default definition of local calling area for purposes of intercarrier compensation be: 1) LATA-wide local calling, 2) based upon the originating carrier's retail local calling area, or 3) some other default definition/mechanism?**

Position:

a) No. The Florida Commission does not have the statutory authority to redefine the ILEC's "local calling areas" for the purpose of determining the applicability of reciprocal compensation, especially to the extent it would change the jurisdictional separation of access and local traffic and alter the current amount of access charges to which the ILEC would otherwise be entitled. i

b) No. Interconnecting companies do not have the authority under state or federal law to redefine or alter the ILEC's "local calling areas" for the purpose of determining the applicability of reciprocal compensation, especially to the extent it would change the jurisdictional separation of access and local traffic and alter the current amount of access charges to which the ILEC would otherwise be entitled.

c) The local calling area should be defined as the retail local calling area of the ILEC for the purposes of reciprocal compensation.

Issue 17: Should the Commission establish compensation mechanisms governing the transport and delivery or termination of traffic subject to Section 251 of the Act to be used in the absence of the parties reaching agreement or negotiating a compensation mechanism? If so, what should be the mechanism?

- a) **Does the Commission have jurisdiction to establish bill and keep?**

- b) **What is the potential financial impact, if any, in ILECs and ALECs of bill and keep arrangements?**
- c) **If the Commission imposes bill and keep as a default mechanism, will the Commission need to define generically “roughly balanced?” If so, how should the Commission define “roughly balanced?”**
- d) **What potential advantages for disadvantages would result from the imposition of bill and keep arrangements as a default mechanism, particularly in comparison to other mechanisms already presented in Phase II of this docket?**

Position:


- a) No position at this time.
- b) No position at this time.
- c) No position at this time.
- d) No position at this time.

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

I. **PENDING MOTIONS:** The Company is not aware of any pending motions at this time.

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

Respectfully submitted this 29th day of March, 2002.



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and

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ATTORNEYS FOR ALLTEL FLORIDA, INC.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 29th day of March, 2002, to the following:

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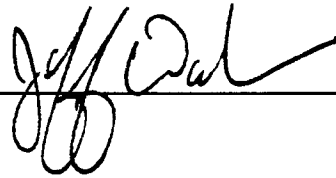
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A handwritten signature in black ink, appearing to read "Jeff Wald", is written over a horizontal line. The signature is stylized and cursive.