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August 7, 2002

## BY HAND DELIVERY

Blanca Bayó  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

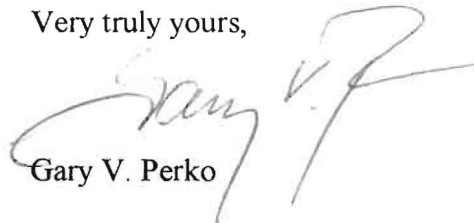
Re: Docket No. 020129-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI WorldCom, Inc. is the original and fifteen copies of WorldCom, Inc.'s Prehearing Statement. By copy of this letter copies have been furnished to the parties shown on the certificate of service list.

If you have any questions please feel free to call me at 425-2359.

Very truly yours,



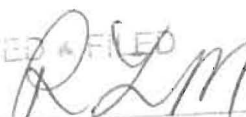
Gary V. Perko

GVP/jlm

Enclosures

cc: Certificate of Service

AUS \_\_\_\_\_  
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CMP \_\_\_\_\_  
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CTR \_\_\_\_\_  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Joint Petition of US LEC of Florida, Inc.,	)	Docket No. 020129-TP
Time Warner Telecom of Florida, LP and	)	
ITC^DeltaCom Communications Objecting to	)	Filed: August 7, 2002
And Requesting Suspension of Proposed	)	
CCS7 Access Arrangement Tariff filed by	)	
BellSouth Telecommunications, Inc.	)	
<hr/>		

**WORLDCOM, INC.'S PREHEARING STATEMENT**

MCI WorldCom Communications, Inc., and MCImetro Access Transmission Services, LLC, (collectively "WorldCom") through their undersigned counsel, hereby submit their Prehearing Statement.

**A. APPEARANCES**

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On behalf of WorldCom, Inc.

**B. WITNESSES**

<u>Witnesses</u>	<u>Issues</u>
Mark E. Argenbright (Direct – Confidential, Rebuttal)	3, 4, 10

**C. EXHIBITS**

<u>Witness</u>	<u>Description</u>
Mark E. Argenbright	<u>MA- 1</u> (Confidential) "Comparison of CCS7 and Local Switching Usage"

MA- 2

“Comparison between BellSouth’s TELRIC Rates and the CCS7 Access Arrangement Rates”

**D. BASIC POSITION**

BellSouth’s CCS7 tariff inappropriately increases access charges, is not revenue neutral, is discriminatory against ALECs and IXCs, favors ILECs and BellSouth’s mobile affiliate, and inappropriately imposes charges on ALECs that they cannot economically pass on to their third party customers. Moreover, BellSouth’s tariff fails to comply with Section 364.163, Florida Statutes. Therefore, the Commission should order BellSouth to withdraw the tariff.

**E. ISSUES AND POSITIONS**

**ISSUE A:** What is the Commission's jurisdiction in this matter?

**WORLDCOM’S POSITION:** The Commission has jurisdiction in this matter under Section 364.01 and Section 364.163, Florida Statutes.

**ISSUE 1:** To what kind of traffic does BellSouth's CCS7 Access Arrangement Tariff apply?

**WORLDCOM’S POSITION:** Adopt the position of US LEC/Time Warner/ITC DeltaCom.

**ISSUE 2:** Did BellSouth provide CCS7 access service to ALECs, IXCs, and other carriers prior to filing its CCS7 Tariff?

**WORLDCOM’S POSITION:** Adopt the position of US LEC/Time Warner/ITC DeltaCom.

**ISSUE 3:** Is BellSouth's CCS7 Access Arrangement Tariff revenue neutral? Why or why not?

**WORLDCOM'S POSITION:** No, BellSouth's CCS7 Access Arrangement Tariff is not revenue neutral. Moreover, BellSouth has essentially abandoned revenue from an access element, local switching, for which demand is generally flat. At the same time, under the guise of revenue neutrality, BellSouth has dramatically increased rates for another access element, CCS7 messages, for which demand is growing significantly. Further, BellSouth's increase in revenue comes directly from its competitors – the IXCs and ALECs.

**ISSUE 4:** Does BellSouth's CCS7 Access Arrangement Tariff violate Section 364.163 or any other provisions of Chapter 364, Florida Statutes?

**WORLDCOM'S POSITION:** Yes, BellSouth's CCS7 Access Arrangement Tariff violates Section 364.163, Florida Statutes. The amended statute, which became effective January 1, 1999, prohibits a local exchange company from increasing any specific network access rates until it has reached parity with its interstate switched access rates. BellSouth's intrastate network access rates are higher than its interstate switched access rates. Until the parity condition is satisfied, the statute does not provide for an increase switched access rates as proposed here by BellSouth.

**ISSUE 5:** What does BellSouth charge subscribers under the CCS7 Access Arrangement Tariff for the types of traffic identified in Issue 1?

**WORLDCOM'S POSITION:** Adopt the position of US LEC/Time Warner/ITC DeltaCom.

**ISSUE 6:** Is more than one carrier billed for Integrated Services Digital Network User Part (ISUP), for the same segment of any given call, under the BellSouth CCS7 Access Arrangement Tariff? If so, is it appropriate?

**WORLDCOM'S POSITION:** Adopt the position of US LEC/Time Warner/ITC DeltaCom.

**ISSUE 7:** Under BellSouth's CCS7 Access Arrangement Tariff, is BellSouth billing ISUP and Transactional Capabilities Application Part (TCAP) messages charges for calls that originate on an ALEC's network and terminate on BellSouth's network? If so, is it appropriate?

**WORLDCOM'S POSITION:** Adopt the position of US LEC/Time Warner/ITC DeltaCom.

**ISSUE 8:** What is the impact, if any, of BellSouth's CCS7 Access Arrangement Tariff on subscribers? Does such impact, if any, affect whether BellSouth's CCS7 Access Arrangement Tariff should remain in effect?

**WORLDCOM'S POSITION:** Adopt the position of US LEC/Time Warner/ITC DeltaCom.

**ISSUE 9:** Does BellSouth bill ILECs for the signaling associated with the types of traffic identified in Issue 1?

- a) If not, why not?
- b) Has BellSouth offered ILECs a bill and keep arrangement for local and/or intrastate CCS7 messages and B-links?

**WORLDCOM'S POSITION:** Adopt the position of US LEC/Time Warner/ITC DeltaCom.

**ISSUE 10:** Should BellSouth's CCS7 Access Arrangement Tariff remain in effect? If not, what action(s) should the Florida Public Service Commission take?

**WORLDCOM'S POSITION:** No, WorldCom believes the Commission should reject BellSouth's tariff filing and return the monies billed to date under this tariff. In the alternative, if the Commission does not reject this tariff filing as WorldCom believes it should, the Commission should reduce BellSouth's proposed rates to match those TELRIC rates established in Docket No. 990649-TP.

**ISSUE 11:** If the tariff is to be withdrawn, what alternatives, if any, are available to BellSouth to establish a charge for non-local CCS7 access service pursuant to Florida law?

**WORLDCOM'S POSITION:** No position at this time.

#### **F. PROPOSED STIPULATIONS**

None.

#### **G. PENDING MOTIONS**

None at this time.

#### **H. REQUIREMENTS THAT CANNOT BE COMPLIED WITH**

All requirements of the procedural order have been met by WorldCom.

Dated, this 7<sup>th</sup> day of August, 2002.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Donna Canzano McNulty for". The signature is written in a cursive style and is positioned above the printed name.

DONNA CANZANO MCNULTY, ESQ.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail and/or hand deliver (\*) to all known parties of record in Docket No. 020129-TP this 7th day of August, 2002.

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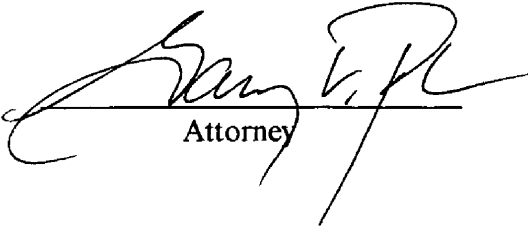
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