

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint petition of US LEC of Florida, Inc., Time Warner Telecom of Florida, L.P., and ITC^DeltaCom Communications objecting to and requesting suspension of proposed CCS7 Access Arrangement tariff filed by BellSouth Telecommunications, Inc.

DOCKET NO. 020129-TP
FILED: AUGUST 14, 2002

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-02-0853-PCO-TP, 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: To what kind of traffic does BellSouth's CCS7 Access Arrangement Tariff apply?

POSITION: No position at this time.

DOCUMENT NUMBER DATE

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

POSITION: No position at this time.

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

POSITION: No position at this time.

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

POSITION: No position at this time.

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

POSITION: No position at this time.

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

POSITION: No position at this time.

ISSUE 7: Under BellSouth's CCS7 Access Arrangement Tariff, is BellSouth billing ISP 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?

POSITION: No position at this time.

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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?

POSITION: No position at this time.

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

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

POSITION: No position at this time.

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

POSITION: No position at this time.

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?

POSITION: No position at this time.

e. Pending Motions

There are no motions pending at this time.

f. Pending Confidentiality Claims or Requests

1. BellSouth's Request for Confidential Classification of Exhibit No. JAR-1 to direct testimony of John A. Ruscilli.

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2. WorldCom's Request for Confidential Classification of portions of direct testimony and Exhibit MA-1 of Mark Argenbright.

3. BellSouth's Request for Confidential Classification of BellSouth's Responses to ITC^DeltaCom's 1st set of interrogatories No. 9 and 1st Request for Production of Documents Nos. 4 and 5.

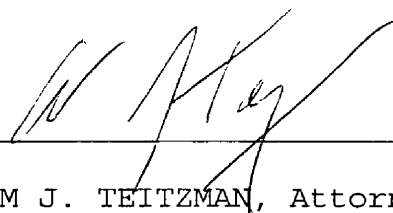
4. ITC^DeltaCom's Request for Confidential Classification of portions of rebuttal testimony of Thomas S. Randklev.

5. ITC^DeltaCom's Request for Confidential Classification of pages 10-11 of Prefiled rebuttal testimony of Steve Brownworth.

g. Compliance with Order No. PSC-02-0853-PCO-TP

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

Respectfully submitted this 14th day of August, 2002.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Staff's Prehearing Statement
has been furnished by U.S. Mail this 14th day of August, 2002, to
the following:

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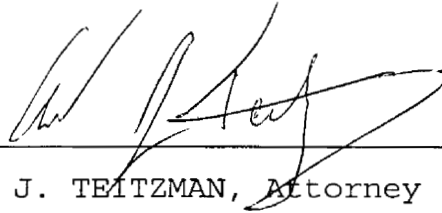
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CERTIFICATE OF SERVICE
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