

M E M O R A N D U M

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September 26, 2002

EP 26 PM 3:28

COMMISSION  
CLERK

TO: DIVISION OF THE COMMISSION CLERK AND ADMINISTRATIVE SERVICES

FROM: OFFICE OF THE GENERAL COUNSEL (A. TEITZMAN) *AT* *bc*

RE: DOCKET NO. 020412-TP - PETITION FOR ARBITRATION OF UNRESOLVED ISSUES IN NEGOTIATION OF INTERCONNECTION AGREEMENT WITH VERIZON FLORIDA INC. BY US LEC OF FLORIDA INC.

Attached is a STAFF'S PREHEARING STATEMENT, to be issued in the above-referenced docket. (Number of pages in order - 5)

DATE ORDER SENT ELECTRONICALLY TO CCA 9/26/02 .

AJT/lg  
 Attachment  
 I: 020412ps.ajt

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DOCUMENT NUMBER DATE  
10324 SEP 26 02  
 FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for arbitration  
of unresolved issues in  
negotiation of interconnection  
agreement with Verizon Florida  
Inc. by US LEC of Florida Inc.

DOCKET NO. 020412-TP  
FILED: SEPTEMBER 26, 2002

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. 020412-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: Is US LEC permitted to select a single Interconnection Point (IP) per Local Access and Transport Area (LATA), to select the interconnection method, and to require Verizon to bear the financial responsibility to deliver its originating traffic to the IP chosen by US LEC?

POSITION: No position at this time.

DOCUMENT ADMINISTRATION

10324 SEP 26 8

FPSC-COMMISSION CLERK

ISSUE 2: If US LEC establishes its own collocation site at a Verizon end office, can Verizon request US LEC to designate that site as a US LEC IP and impose additional charges on US LEC if US LEC declines that request?

POSITION: No position at this time.

ISSUE 3: Is US LEC entitled to reciprocal compensation for terminating and/or delivering "Voice Information Services" traffic?

POSITION: No position at this time.

ISSUE 4: Should US LEC be required to provide dedicated trunking at its own expense for Voice Information Service traffic that originates on its network for delivery to Voice Information Service providers served by Verizon?

POSITION: No position at this time.

ISSUE 5: Should the term "terminating party" or the term "receiving party" be employed for purposes of traffic measurement and billing over interconnection trunks.

POSITION: No position at this time.

ISSUE 6: (A) Should the parties pay reciprocal compensation for calls that originate in one local calling area and are delivered to a customer located in a different local calling area, if the NXX of the called number is associated with the same local calling area as the NXX of the calling number?

(B) Should the originating carrier be able to charge originating access on the traffic described in Issue 6(a)?

POSITION: No position at this time.

ISSUE 7: What compensation framework should govern the parties' exchange of ISP-bound traffic in the event the interim compensation framework set forth in the FCC's Internet Order is vacated or reversed on appeal?

POSITION: No position at this time.

ISSUE 8: Under what circumstances, if any, should tariffed charges which take effect after the agreement becomes effective, take precedence over non-tariffed charges previously established in the agreement for the same or similar services or facilities?

POSITION: No position at this time.

e. Pending Motions

None.

f. Pending Confidentiality Claims or Requests

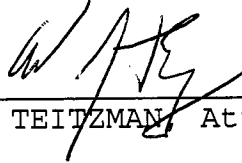
None.

g. Compliance with Order No. PSC-02-0993-PCO-TP

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

STAFF'S PREHEARING STATEMENT  
DOCKET NO. 020412-TP  
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Respectfully submitted this 26<sup>th</sup> day of September, 2002.



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ADAM J. TEITZMAN, Attorney

FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Boulevard  
Gerald L. Gunter Building - Room 370  
Tallahassee, Florida 32399-0863  
(850)413-6199

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for arbitration  
of unresolved issues in  
negotiation of interconnection  
agreement with Verizon Florida  
Inc. by US LEC of Florida Inc.

DOCKET NO. 020412-TP  
ORDER NO.  
ISSUED:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of STAFF'S PREHEARING STATEMENT  
has been furnished by U.S. Mail this 26<sup>th</sup> day of September, 2002,  
to the following:

Kellogg Huber Law Firm  
Aaron Panner/Scott Angstreich  
1615 M Street, N.W., Suite 400  
Washington, DC 20036

Swidler & Berlin  
Richard Rindler/Michael L. Shor  
3000 K. Street, NW  
Washington, DC 20007


Verzion  
Gregory Romano, Esq.  
1515 North Courthouse Road  
Suite 500  
Arlington, VA 22201

Verizon Florida Inc.  
Ms. Michelle A. Robinson  
Mr. David Christian  
106 East College Avenue, Ste 810  
Tallahassee, FL 32301-7704

Rutledge Law Firm  
Ken Hoffman/M. McDonnell  
215 South Monroe St., Ste 420  
Tallahassee, FL 32301-1841

US LEC of Florida Inc.  
Wanda Montano  
6801 Morrison Blvd.  
Charlotte, NC 28211-3599

Verizon Florida Inc.  
Ms. Kimberly Caswell, Esq.  
201 North Franklin St., FLTC0007  
Tampa, FL 33602

  
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ADAM J. TEITZMAN, Attorney

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2540 Shumard Oak Boulevard  
Gerald L. Gunter Building - Room 370  
Tallahassee, Florida 32399-0863  
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