

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Global NAPS,
Inc. for arbitration pursuant to
47 U.S.C. 252(b) of
interconnection rates, terms and
conditions with ALLTEL Florida,
Inc.

DOCKET NO. 011354-TP
FILED: NOVEMBER 4, 2002

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-02-1312-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(a): Should ALLTEL be required to establish an Interconnection Point outside of its network?

POSITION

STAFF: Staff has no position at this time.

DOCUMENT NUMBER-DATE

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ISSUE 1(b): If ALLTEL should be required to establish an Interconnection Point outside of its network, should ALLTEL be exempt from this requirement pursuant to §251(f)(1) of the Telecommunications Act of 1996, or should this requirement be suspended or modified pursuant to §251(f)(2)?

POSITION

STAFF: Staff has no position at this time.

ISSUE 1(c): If ALLTEL is required to establish an Interconnection Point outside of its network, should each Party be responsible for the costs associated with transporting traffic to the interconnection point or points outside of ALLTEL's network on each party's respective side of the Interconnection Point?

POSITION

STAFF: Staff has no position at this time.

ISSUE 1(d): If each party should be responsible for the costs associated with transporting traffic to the interconnection point or points outside of ALLTEL's network, should ALLTEL be exempt from this requirement pursuant to §251(f)(1), or should this requirement be suspended or modified pursuant to §251(f)(2)?

POSITION

STAFF: Staff has no position at this time.

ISSUE 2(a): Should ALLTEL be required to establish a single Interconnection Point at GNAP's designation within ALLTEL's network within a LATA?

POSITION

STAFF: Staff has no position at this time.

ISSUE 2(b): If ALLTEL should be required to establish a single Interconnection Point at GNAP's designation within ALLTEL's network within a LATA, should ALLTEL be exempt from this requirement pursuant to §251(f)(1), or should this requirement be suspended or modified pursuant to §251(f)(2)?

POSITION

STAFF: Staff has no position at this time.

ISSUE 2(c): If ALLTEL is required to establish a single Interconnection Point at GNAP's designation within ALLTEL's network within a LATA, should each Party be responsible for the costs associated with transporting traffic to the interconnection point or points on each party's respective side of the Interconnection Point?

POSITION

STAFF: Staff has no position at this time.

ISSUE 2(d): If each party should be responsible for the costs associated with transporting traffic to the interconnection point or points within ALLTEL's network within a LATA, should ALLTEL be exempt from this requirement pursuant to §251(f)(1), or should this requirement be suspended or modified pursuant to §251(f)(2)?

POSITION

STAFF: Staff has no position at this time.

ISSUE 3(a): Should ALLTEL's local calling area boundaries be the basis for distinguishing between when reciprocal compensation (i.e., local) versus exchange access compensation (intraLATA switched access) apply?

POSITION

STAFF: Staff has no position at this time.

ISSUE 3(b): If ALLTEL's local calling area boundaries should not be the basis for distinguishing between when reciprocal compensation (i.e., local) versus exchange access compensation (intraLATA switched access) applies, should ALLTEL be exempt from this requirement pursuant to §251(f)(1), or should this requirement be suspended or modified pursuant to §251(f)(2)?

POSITION

STAFF: Staff has no position at this time.

ISSUE 4(a): Should GNAPs be able to assign to its customers NXX codes that are rate centered in a central office switch serving a local calling area which is outside that in which the customer is located?

POSITION

STAFF: Staff has no position at this time.

ISSUE 4(b): If GNAPs should be able to assign to its customers NXX codes that are rate centered in a central office switch serving a local calling area which is outside that in which the customer is located, should ALLTEL be exempt from this requirement pursuant to §251(f)(1), or should any aspects of this requirement be suspended or modified pursuant to §251(f)(2)?

POSITION

STAFF: Staff has no position at this time.

ISSUE 5: Should explicit language be included in the agreement which specifically provides for renegotiations if there is a change in the law regarding whether ISP-bound calls are local traffic and subject to reciprocal compensation under 47 U.S.C. §251(b) (5)?

POSITION

STAFF: Staff has no position at this time.

ISSUE 6: Should explicit language as proposed by GNAPs be included with respect to "litigation costs" and "penalties"?

POSITION

STAFF: Staff has no position at this time.

e. Pending Motions

None.

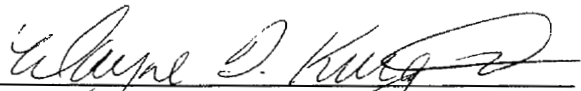
f. Pending Confidentiality Claims or Requests

None.

g. Compliance with Order No. PSC-02-1312-PCO-TP

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

Respectfully submitted this 4th day of November, 2002.


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Certificate of Service

I HEREBY CERTIFY that one true and correct copy of Staff's
Prehearing Statement, has been served VIA-U.S. MAIL, this 4th day
of November, 2002, to the following:

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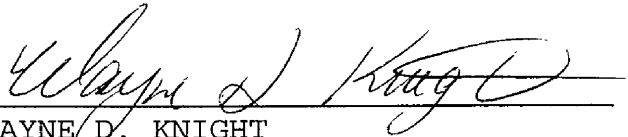
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