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 Verizon Florida Inc.

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-02-0430-PCO-TP, issued March: 29,07 2002, modified by Order Nos. PSC-02-1461-PCO-TP, issued October 23, 2002; PSC-02-1638-PCO-TP, issued November 25, 2002; and PSC-03-0073-PCO-TP, issued January 9, 2003, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. <u>All Known Witnesses</u>

None.

b. All Known Exhibits

None.

c. <u>Staff's Statement of Basic Position</u>

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

<u>Issue 1</u>: (A) May GNAPs designate a single physical point of interconnection per LATA on Verizon's existing network?

(B) If GNAPs chooses a single point of interconnection (SPOI) per LATA on Verizon's network, should Verizon receive any compensation from GNAPs for transporting

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Verizon local traffic to this SPOI? If so, how should the compensation be determined?

Position: Staff has no position at this time.

<u>Issue 2</u>: Should the parties' interconnection agreement require mutual agreement on the terms and conditions relating to the deployment of two-way trunks when GNAPs chooses to use them?

Position: Staff has no position at this time.

<u>Issue 3</u>: (A) Should GNAPs be required to provide collocation to Verizon at GNAPs' facilities in order to interconnect with GNAPs?

(B) If Verizon cannot collocate at GNAPs' facilities, should GNAPs charge Verizon distance-sensitive rates for transport?

Position: Staff has no position at this time.

<u>Issue 4</u>: Which carrier's local calling area should be used as the basis for determining intercarrier compensation obligations?

Position: Staff has no position at this time.

<u>Issue 5</u>: Should GNAPs be permitted to assign NXX codes to customers that do not physically reside in the local calling area associated with that NXX code?

Position: Staff has no position at this time.

<u>Issue 6</u>: Should the parties' interconnection agreement include a change in law provision specifically devoted to the ISP Remand Order?

Position: Staff has no position at this time.

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<u>Issue 7</u>: Should the parties' interconnection agreement incorporate by reference each parties' respective tariffs?

Position: Staff has no position at this time.

Issue 8: What amounts and types of insurance should GNAPs be required to obtain?

Position: Staff has no position at this time.

- <u>Issue 9</u>: To what extent should the parties be permitted to conduct audits to ensure (i) the accuracy of each other's bills, and (ii) appropriate use and disclosure of Verizon OSS Information?
- Position: Staff has no position at this time.
- Issue 10: When should a change in law be implemented?
- Position: Staff has no position at this time.
- <u>Issue 11</u>: Should GNAPs be permitted access to network elements that have not already been ordered unbundled?

Position: Staff has no position at this time.

e. <u>Pending Motions</u>

Staff has no pending motions.

f. Pending Confidentiality Claims or Requests

Staff has no pending confidentiality claims or requests.

g. <u>Compliance with Order No. PSC-02-0430-PCO-TP, issued March 29,</u> 2002, modified by Order Nos. PSC-02-1461-PCO-TP, issued October 23, 2002; PSC-02-1638-PCO-TP, issued November 25, 2002; and PSC-03-0073-PCO-TP

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

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Respectfully submitted this 3rd day of February, 2003.

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LEE FORDHAM Staff Counsel

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 011666-TP FILED: FEBRUARY 3, 2003

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that one copy of Staff's Prehearing Statement, has been served U.S. Mail, this 3rd day of February, 2003, to the following:

Coyle Raywid & Braverman LLP John Dodge/David N. Tobenkin 1919 Pennsylvania Avenue NW 2nd Floor Washington, DC 20006 Global NAPS, Inc. William J. Rooney, Jr. 89 Access Road Norwood, MA 02062-5232

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Jee ! LEE FORDHAM

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