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June 30, 2003

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Ms. Blanca Bayó, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket Nos. 981834-TP and 990321-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of ITC^DeltaCom Communications, Inc. are an original and fifteen copies of the Prehearing Statement of ITC^DeltaCom Communications, Inc. Also enclosed is a 3 1/2" diskette with the document on it in Microsoft Word 97/2000 format.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,


Floyd R. Self

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Enclosures
cc: Nanette Edwards, Esq.
Parties of Record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for)
Commission action to support local competition) Docket No. 981834-TP
in BellSouth Telecommunications, Inc.'s service)
territory.)
_____)

Petition of ACI Corp. d/b/a Accelerated)
Connections, Inc. for generic investigation to)
ensure that BellSouth Telecommunications, Inc.,)
Sprint-Florida, Incorporated, and GTE) Docket No. 990321-TP
Florida Incorporated comply with obligation) Filed: June 30, 2003
provide alternative local exchange)
carriers with flexible, timely, and cost-efficient)
physical collocation)
_____)

**PREHEARING STATEMENT OF
ITC^DELTA COM COMMUNICATIONS, INC.**

Pursuant to Order No. PSC-02-1513-PCO-TP, issued November 4, 2002, as subsequently amended (“Order on Procedure”),¹ ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom (“ITC^DeltaCom”) hereby files its Prehearing Statement in the captioned dockets as follows:

A. Known Witnesses

ITC^DeltaCom has not prefiled testimony for Issues 1 – 8 as identified in the Order on Procedure for this phase of these dockets. At this time, ITC^DeltaCom does reserve the right to call agents, officers and employees of BellSouth Telecommunications, Inc., (“BellSouth”), Verizon Florida, Inc. (“Verizon”) and Sprint-Florida, Inc. (“Sprint”) as adverse party witnesses,

¹ By Order No. PSC-03-0702-FOF-TP, issued June 11, 2003, the Commission approved the parties’ agreement to proceed with the current hearing schedule for Issues 1 through 8, as identified in the Order on Procedure, and to reschedule proceedings as to Issues 9 through 10. Since separate a separate Prehearing Conference and Prehearing Statements are scheduled for Issues 9 through 10, this Prehearing Statement addresses only Issues Nos. 1 through 8.

pending review of the parties' prehearing statements, rebuttal testimony and depositions, if any, and ITC^DeltaCom reserves its right to cross examine the witnesses of any other party.

B. Known Exhibits

ITC^DeltaCom did not prefile any exhibits for Issues 1 – 8 as identified in the Order on Procedure for this phase of these dockets. However, ITC^DeltaCom reserves the right to identify and introduce additional exhibits during cross-examination of other parties' witnesses and re-direct of its own, if any, and, to the extent permitted by Commission rules and the Florida Rules of Civil Procedure, to identify and introduce the depositions of other parties' agents, officers and employees.

C. Statement of Basic Position

Agree with AT&T's position.

D – F. Statement of Issues and Positions

Below is a list of issues, as identified in the Commission's Order on Procedure and ITC^DeltaCom's tentative positions on those issues.

ISSUE 1A: When should an ALEC be required to remit payment for non-recurring charges for collocation space?

ITC^DeltaCom: Agree with AT&T's position.

ISSUE 1B: When should billing of monthly recurring charges begin?

ITC^DeltaCom: Agree with AT&T's position.

ISSUE 1C: What cancellation charges should apply if an ALEC cancels its request for collocation space?

ITC^DeltaCom: Agree with AT&T's position.

ISSUE 2A: Should an ALEC be required to justify its space reservation needs to the ILEC when an ILEC is forced to consider a building addition to accommodate future space requirements?

ITC^DeltaCom: Agree with AT&T's position.

ISSUE 2B: Under what conditions should an ILEC be allowed to reclaim unused collocation space?

ITC^DeltaCom: Agree with AT&T's position.

ISSUE 2C: What obligations, if any, should be placed on the ALEC that contracted for the space?

ITC^DeltaCom: Agree with AT&T's position.

ISSUE 2D: What obligations, if any, should be placed on the ILEC?

ITC^DeltaCom: Agree with AT&T's position.

ISSUE 3: Should an ALEC have the option to transfer accepted collocation space to another ALEC? If so, what are the responsibilities of the ILEC and ALECs.

ITC^DeltaCom: Agree with AT&T's position.

ISSUE 4: Should the ILEC be required to provide copper entrance facilities within the context of a collocation inside the central office?

ITC^DeltaCom: Yes.

ISSUE 5: Should an ILEC be required to offer, at a minimum, power in standardized increments? If so, what should the standardized power increments be?

ITC^DeltaCom: Agree with AT&T's position.

ISSUE 6A: Should an ILEC's per ampere (amp) rate for the provisioning of DC power to an ALEC's collocation space apply to amps used or fused capacity?

ITC^DeltaCom: Agree with AT&T's position.

ISSUE 6B: If power is charged on a per-amp-used basis or on a fused capacity basis, how should the charge be calculated and applied?

ITC^DeltaCom: Agree with AT&T's position.

ISSUE 6C: When should an ILEC be allowed to begin billing an ALEC for power?

ITC^DeltaCom: Agree with AT&T's position.

ISSUE 7: Should an ALEC have the option of an AC power feed to its collocation space?

ITC^DeltaCom: Yes.

ISSUE 8: What are the responsibilities of the ILEC, if any, when an ALEC requests collocation space at a remote terminal where space is not available or space is nearing exhaustion?

ITC^DeltaCom: Agree with AT&T's position.

G. Stipulated Issues

ITC^DeltaCom is unaware of any stipulated issues at the time of serving this filing.

H. Pending Motions

ITC^DeltaCom has no pending motions at the time of serving this filing.

I. Pending Confidentiality Issues

ITC^DeltaCom is not aware of any pending confidentiality issues raised by ITC^DeltaCom at the time of serving this filing.

J. Order Establishing Procedure Requirements

To ITC^DeltaCom's knowledge, at the time of serving this filing, there are no requirements of the Order on Procedure that cannot be complied with.

K. Decisions or Pending Decisions

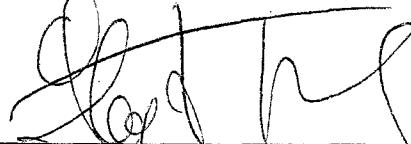
At the time of serving this filing, ITC^DeltaCom is not aware of any decision or pending FCC or court decision that has or may preempt or otherwise impact the Commission's ability to resolve any of the above issues.

L. Objections to Expert Qualifications

Witnesses in this proceeding may have rendered opinions on what may be considered legal issues. In the past, the Commission has permitted non-lawyers to render opinions on legal matters, but the Commission has typically not accepted such opinions as those of legal experts.

If the Commission accepts the legal opinions of these non-lawyers as expert legal opinions, then ITC^DeltaCom would reserve its right to conduct voir dire of those witnesses as to those legal opinions. Otherwise, ITC^DeltaCom would reserve its right to conduct cross examination of the witnesses on their opinions.

RESPECTFULLY SUBMITTED, this 30th day of June, 2003.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery (*) and/or U. S. Mail this 30th day of June, 2003.

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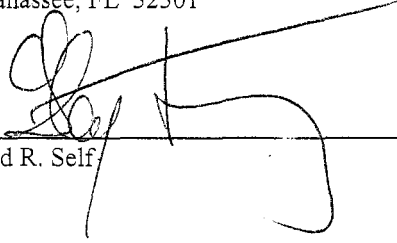
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