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May 1, 2006


Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 050419-TP
Petition of MCImetro Access Transmission Services, LLC for Arbitration of
Interconnection Agreement with BellSouth Telecommunications, Inc.

Dear Ms. Bayo:

Enclosed are the original and 15 copies of MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services' Prehearing Statement for filing in the above matter. Also enclosed is a diskette with a copy of the Prehearing Statement in Word format. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-1256.

Sincerely,



Leigh A. Hyer

LAH:tas
Enclosures

DOCUMENT NUMBER-DATE

03843 MAY-1 8

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

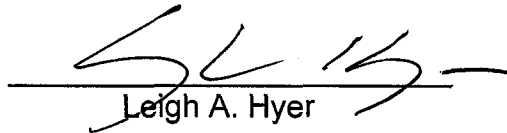
I hereby certify that copies of MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services' Prehearing Statement in Docket No. 050419-TP were sent via hand-delivery(*) and U.S. mail(**) on May 1, 2006 to:

Kira Scott, Staff Counsel(*)
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

BellSouth Telecommunications, Inc.(**)
N. White/R. D. Lackey/J. Meza
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

BellSouth Telecommunications, Inc.(**)
Robert A. Culpepper
BellSouth Center – Suite 4300
675 West Peachtree Street, N.E.
Atlanta, GA 30375

Verizon Communications(**)
Dulaney L. O'Roark
Six Concourse Parkway, Suite 600
Atlanta, GA 30328


Leigh A. Hyer

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCImetro Access Transmission) Docket No. 050419-TP
Services LLC for arbitration of certain terms and) Filed: May 1, 2006
conditions of proposed interconnection agreement)
with BellSouth Telecommunications, Inc.)
_____)

VERIZON ACCESS TRANSMISSION SERVICES' PREHEARING STATEMENT

In accordance with Order No. PSC-05-0927-PCO-TP (Order Establishing Procedure), as modified by Order Nos. PSC-05-1212-PCO-TP and PSC-05-1264-PCO-TP, MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services ("Verizon Access") hereby files this Prehearing Statement.

(a) Witnesses

Verizon Access has pre-filed the Supplemental Testimony of Don Price, which addresses the outstanding issues: Issues 12, 26 and 34. In addition, on Issue 12, Mr. Price will adopt the Direct Testimony of Greg Darnell at p. 32, line 5 through p. 33 line 9, and the Rebuttal Testimony of Greg Darnell at p. 22, line 18 through p. 24 line 21. On Issue 34, Mr. Price will adopt the Direct Testimony of Greg Darnell at p. 50, line 11 through p. 52, line 8, and the Rebuttal Testimony of Greg Darnell at p. 28, line 12 through p. 30, line 11.

(b) Exhibits

Verizon Access intends to introduce the following exhibits:

1. Matrix of Unresolved Issues
2. Attachment 2 to Interconnection Agreement
3. Attachment 3 to Interconnection Agreement
4. Attachment 7 to Interconnection Agreement
5. Deposition of Pam Tipton

6. MCI's Objections and Responses to BellSouth's First Set of Interrogatories (Nos. 1-56)
7. MCI's Objections and Responses to BellSouth's First Request for Production of Documents.

Verizon Access reserves the right to introduce additional exhibits at the hearing or at other appropriate points in these proceedings.

(c) Verizon Access' Basic Position

The parties have been able to resolve most of the issues raised in Verizon Access' arbitration petition, but three issues remain outstanding. Because Verizon Access' proposed resolution of these issues is consistent with the Telecommunications Act of 1996 and sound public policy, each of the issues below should be resolved in its favor.

(d) - (f) Issues and Positions

The following are the issues listed in the April 5, 2006 Order Approving Revised Issues, along with Verizon Access' position on the issues that were unresolved at the time of the Order:

- ISSUE 1:** Resolved
- ISSUE 2:** Resolved
- ISSUE 3:** Resolved
- ISSUE 4:** Resolved
- ISSUE 5:** Resolved
- ISSUE 6:** Resolved
- ISSUE 7:** Resolved
- ISSUE 8:** Resolved
- ISSUE 9:** Resolved

ISSUE 10: Resolved

ISSUE 11: Resolved

ISSUE 12: Should Verizon Access be required to indemnify BellSouth for BellSouth's own negligence for claims by third parties who are not Verizon Access customers in conjunction with BellSouth's provision of PBX Locate Service to Verizon Access?

VERIZON ACCESS: No. Verizon Access should not be required to provide such indemnification because it has no contractual relationship with such third parties and thus has no way to limit its liability.

ISSUE 13: Resolved

ISSUE 14: Resolved

ISSUE 15: Resolved

ISSUE 16: Resolved

ISSUE 17: Resolved

ISSUE 18: Resolved

ISSUE 19: Resolved

ISSUE 20: Resolved

ISSUE 21: Resolved

ISSUE 22: A) Should virtual NXX services offered by Verizon Access to its customers be treated as local traffic or switched access traffic for intercarrier compensation purposes?

B) If they should be treated as switched access traffic, how will such traffic be identified for purposes of the separate treatment?

VERIZON ACCESS: This issue has been resolved.

ISSUE 23: Resolved

ISSUE 24: Resolved

ISSUE 25: Resolved

ISSUE 26: Is BellSouth obligated to act as a transit carrier? If so, what is the appropriate transit rate?

VERIZON ACCESS: BellSouth is obligated to act as a transit carrier because the parties have agreed to language requiring it to perform that function. The parties have attempted to negotiate a transit rate, but have been unable to agree, so determination of a rate by the Commission is required. Because BellSouth has not justified the transit rate it proposes to charge, the existing rate should remain in place.

ISSUE 27: Resolved

ISSUE 28: Georgia issue only.

ISSUE 29: Resolved

ISSUE 30: Resolved

ISSUE 31: Resolved

ISSUE 32: What charges, if any, should be imposed for records changes made by the Parties to reflect changes in corporate names or other LEC identifiers such as OCN, CC, CIC and ACNA?

VERIZON ACCESS: This issue has been resolved.

ISSUE 33: How should the rate for the calculation of late payments be determined?

VERIZON ACCESS: This issue has been resolved.

ISSUE 34: What process should be used for the discontinuing of service?

VERIZON ACCESS: The principal dispute is whether, if Verizon Access fails to pay a bill for a BellSouth service, BellSouth may suspend, discontinue or terminate all services it provides to Verizon Access regionwide. BellSouth's proposed language that would permit it to take this action is unreasonable because it could result in all services to Verizon Access being suspended, discontinued or terminated in all BellSouth states because a small bill for a minor service in one state was mistakenly not paid.

ISSUE 35: North Carolina issue only.

(g) Stipulated Issues

There are no stipulated issues at this time.

(h) Pending Motions And Other Matters

Verizon Access has no motions or other matters pending.

(i) Pending Requests For Confidentiality

Verizon Access has no pending requests for confidentiality.

(j) Procedural Requirements

Verizon Access is unaware of any requirements set forth in the Commission's Procedural Order that cannot be complied with at this time.

(k) Pending Decisions

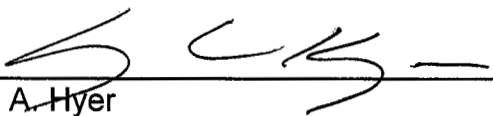
The issue of the appropriate transit rate is being considered by the Commission in its generic transit traffic case in Docket Nos. 050119-TP and 050125-TP. The Commission's decision in those dockets thus may affect the outcome of Issue 26 in this docket.

(l) Witnesses

Verizon Access has no matters to raise concerning witnesses at this time.

Respectfully submitted on May 1, 2006.

By:


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Services LLC d/b/a Verizon Access Transmission
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