

Kimberley Pena

From: Martha Johnson [marthaj@fcta.com]
Sent: Friday, August 08, 2008 4:38 PM
To: Filings@psc.state.fl.us
Subject: Docket No. 080000 - Undocketed - Post-Workshop Comments of the Florida Cable Telecommunications Association
Attachments: FCTA Comments to CLEC Access Charges Workshop.pdf

A. The person responsible for this electronic filing is:

David A. Konuch
Senior Counsel, Regulatory Law and Technology
Florida Cable Telecommunications Association
246 E. 6th Avenue
Tallahassee, FL 32303
850-681-1990
850-681-9676
dkonuch@fcta.com

- B.** The docket number and title are: **In Re: Docket No. 080000 (Undocketed) – CLEC Intrastate Access Charges Workshop**
- C.** This document is filed on behalf of the Florida Cable Telecommunications Association, Inc.
- D.** The cover letter and Post-Workshop Comments are a total of 4 pages.
- E.** Attached are the Florida Cable Telecommunications Association's cover letter and Post-Workshop Comments.

Thank you,

Martha Johnson
Regulatory Assistant
Florida Cable Telecommunications Association
246 E. 6th Avenue
Tallahassee, FL 32303
850/681-1990
850/681-9676 (fax)

DOCUMENT NUMBER-DATE

07023 AUG-8 8

FPSC-COMMISSION CLERK



Florida Cable Telecommunications Association

Steve Wilkerson, President

August 8, 2008

VIA ELECTRONIC FILING

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: **Docket No. 080000 - Undocketed - CLEC Intrastate Access Charges Workshop**

Dear Ms. Cole:

Enclosed for electronic filing in the above referenced Docket, please find the Post-Workshop Comments of the Florida Cable Telecommunications Association, Inc.

If you have any questions whatsoever, please do not hesitate to contact me at (850) 681-1990.

Your assistance in this matter is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Konuch', is written over a horizontal line.

David A. Konuch
Senior Counsel, Regulatory Law and Technology
Florida Cable Telecommunications Association
246 E. 6th Avenue
Tallahassee, FL 32303
Phone: 850-681-1990
Fax: 850-681-9676

Enclosures

DOCUMENT NUMBER - DATE

07023 AUG-8 08

FPSC-COMMISSION CLERK

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

DOCKET NO. 080000 - UNDOCKETED

In the Matter of:

CLEC INTRASTATE ACCESS CHARGES WORKSHOP

**POST-WORKSHOP COMMENTS OF FLORIDA CABLE
TELECOMMUNICATIONS ASSOCIATION, INC.**

Florida Cable Telecommunications Association, Inc. hereby submits its comments following the rule development workshop that occurred July 16, 2008 to consider the reasonableness of intrastate access charges of Competitive Local Exchange Carriers (CLECs).

FCTA's members operate cable systems to provide multi-channel video, high speed Internet, and voice services within Florida. FCTA's member operators provide, by and large, the only facilities-based mass market telephony competition to Florida's Incumbent Local Exchange Carriers (ILECs).

ILECs charge different rates for intrastate access services within Florida. Likewise, FCTA member operators also do not charge the same rate for intrastate switched access services throughout Florida. Some of FCTA's members mirror the rate of the ILEC in their local service area when

assessing intrastate switched access charges, while other FCTA members charge more than the ILEC rate.

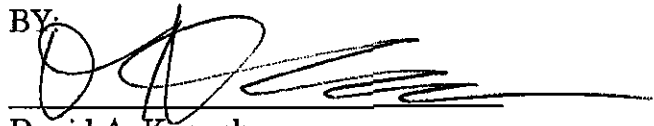
FCTA believes that telecommunications carriers, whether ILECs or CLECs, should not abuse their control over telecommunications network access points, whether those access points constitute terminating switched access or above-cost pricing by ILECs for access to tandem switches. Even so, the various intercarrier charges that carriers impose on each other when providing service often are interrelated. The workshop participants debated whether the Commission possessed jurisdiction to address ILEC switched access rates pursuant to state statutes or CLEC access charges. As Commission jurisdiction to address access charges of CLECs or ILECs remains unclear at this time, to address CLEC access charges could have unintended consequences. Accordingly, the Commission should proceed cautiously in this area

FCTA reserves the right to change or modify its position on these issues as a result of any new information received or developments at the federal level. In addition, FCTA by not making any particular argument here, FCTA expressly does not waive its ability to make such argument in

the future in this or any other proceeding.

RESPECTFULLY SUBMITTED this 8th day of August, 2008.

BY:

A handwritten signature in black ink, appearing to read 'D. Konuch', written over a horizontal line.

David A. Konuch
Senior Counsel for Regulatory Law &
Technology
Florida Cable Telecommunications
Association
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Tallahassee, FL 32303
850-681-1990
850-681-9676 (fax)
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