

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition by Intrado Communications, Inc. for arbitration to establish an interconnection agreement with Verizon Florida LLC, pursuant to Section 252(b) of the Communications Act of 1934, as amended, and Section 364.162, F.S.

DOCKET NO. 080134-TP

DATED: AUGUST 5, 2009

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-08-0745-PCO-TP, issued November 12, 2008, and Order No. PSC-09-0189-PCO-TP, issued March 27, 2009, 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 Issues¹

ISSUE 3: WHERE SHOULD THE POINTS OF INTERCONNECTION BE LOCATED AND WHAT TERMS AND CONDITIONS SHOULD APPLY WITH REGARD TO INTERCONNECTION AND TRANSPORT OF TRAFFIC?

Position: Staff has no position at this time.

ISSUE 4: (A) SHOULD THE PARTIES IMPLEMENT INTER-SELECTIVE ROUTER TRUNKING?

¹ Issues 1, 2, 5, 7-8, 10-11, 16-33, 37-45, 48, 50-51, 54 were resolved by the parties prior to issuance of the Order Establishing Procedure.

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(B) IF SO, WHAT TERMS AND CONDITIONS SHOULD GOVERN PSAP-TO-PSAP CALL TRANSFERS USING INTER-SELECTIVE ROUTER TRUNKING?

Position: Staff has no position at this time.

ISSUE 6: SHOULD REQUIREMENTS BE INCLUDED IN THE ICA ON A RECIPROCAL BASIS FOR FORECASTING?

Position: Staff has no position at this time.

ISSUE 9: WHAT TERMS AND CONDITIONS SHOULD GOVERN HOW THE PARTIES WILL INITIATE INTERCONNECTION?

Position: Staff has no position at this time.

ISSUE 12: HOW WILL THE PARTIES ROUTE 911/E-911 CALLS TO EACH OTHER?

Position: Staff has no position at this time.

ISSUE 13: SHOULD THE ICA INCLUDE A DESCRIPTION OF VERIZON'S 911/E-911 FACILITIES? IF SO, WHAT IS THE APPROPRIATE DESCRIPTION?

Position: Staff has no position at this time.

ISSUE 14: SHOULD THE ICA INCLUDE A PROVISION FOR MAINTAINING ALL STEERING TABLES? IF SO, WHAT PROVISIONS SHOULD BE INCLUDED?

Position: Staff has no position at this time.

ISSUE 15: SHOULD CERTAIN DEFINITIONS RELATED TO THE PARTIES' PROVISION OF 911/E-911 SERVICE BE INCLUDED IN THE ICA AND WHAT DEFINITIONS SHOULD BE USED?

Position: Staff has no position at this time.

**ISSUE 34: (A) WHAT WILL VERIZON CHARGE INTRADO COMM FOR 911/E-911 RELATED SERVICES?
(B) WHAT WILL INTRADO COMM CHARGE VERIZON FOR 911/E-911 RELATED SERVICES?
(C) SHOULD INTRADO COMM'S PROPOSED INTERCONNECTION RATES BE ADOPTED?**

Position: Staff has no position at this time.

ISSUE 35: (A) SHOULD ALL "APPLICABLE" TARIFF PROVISIONS BE INCORPORATED INTO THE ICA?
(B) SHOULD TARIFFED RATES APPLY WITHOUT A REFERENCE TO THE SPECIFIC TARIFF?
(C) SHOULD TARIFFED RATES AUTOMATICALLY SUPERSEDE THE RATES CONTAINED IN PRICING ATTACHMENT, APPENDIX A WITHOUT A REFERENCE TO THE SPECIFIC TARIFF?
(D) SHOULD VERIZON'S PROPOSED LANGUAGE IN PRICING ATTACHMENT SECTION 1.5 WITH REGARD TO "TBD" RATES BE INCLUDED IN THE ICA?

Position: Staff has no position at this time.

ISSUE 36: MAY VERIZON REQUIRE INTRADO COMM TO CHARGE THE SAME RATES AS, OR LOWER RATES THAN, THE VERIZON RATES FOR THE SAME SERVICES, FACILITIES, AND ARRANGEMENTS?

Position: Staff has no position at this time.

ISSUE 46: SHOULD INTRADO COMM HAVE THE RIGHT TO HAVE THE AGREEMENT AMENDED TO INCORPORATE PROVISIONS PERMITTING IT TO EXCHANGE TRAFFIC OTHER THAN 911/E-911 CALLS?

Position: Staff has no position at this time.

ISSUE 47: SHOULD THE TERM "A CALLER" BE DELETED FROM SECTION 1.1.1 OF THE 911 ATTACHMENT TO THE ICA?

Position: Staff has no position at this time.

ISSUE 49: SHOULD THE WAIVER OF CHARGES FOR 911 CALL TRANSPORT, 911 CALL TRANSPORT FACILITIES, ALI DATABASE, AND MSAG, BE QUALIFIED AS PROPOSED BY INTRADO COMM BY OTHER PROVISIONS OF THE AGREEMENT?

Position: Staff has no position at this time.

ISSUE 52: SHOULD THE RESERVATION OF RIGHTS TO BILL CHARGES TO 911 CONTROLLING AUTHORITIES AND PSAPS BE QUALIFIED AS PROPOSED BY INTRADO COMM BY "TO THE EXTENT PERMITTED UNDER THE PARTIES' TARIFFS AND APPLICABLE LAW"?

Position: Staff has no position at this time.

ISSUE 53: SHOULD 911 ATT. § 2.5 BE MADE RECIPROCAL AND QUALIFIED AS PROPOSED BY INTRADO COMM?

Position: Staff has no position at this time.

e. Pending Motions

Staff has no pending motions.

f. Pending Confidentiality Claims or Requests

Staff has no pending confidentiality claims or requests.

g. Compliance with Order No. PSC-08-0745-PCO-TP and Order No. PSC-09-0189-PCO-TP

Staff has complied with all requirements of the Orders Establishing and Modifying Procedure entered in this docket.

Respectfully submitted this 5th day of August, 2009.



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Staff Counsel

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of COMMISSION STAFF'S PREHEARING STATEMENT has been filed with Office of Commission Clerk and one copy has been furnished to the following by electronic and U. S. mail this 5th day of August, 2009:

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