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December 8, 1995

Via Federal Express

ORIGINAL
FILE COPY

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Re: Resolution of Petition(s) to establish nondiscriminatory rates, terms, and conditions for interconnection involving local exchange companies and alternative local exchange companies pursuant to Section 364.162, Florida Statutes (Interconnection Petition of Metropolitan Fiber Systems of Florida, Inc.)

Dear Mrs. Bayo:

Enclosed is an original and 15 copies of the Rebuttal Testimony of Timothy T. Devine on Behalf of Metropolitan Fiber Systems of Florida, Inc. (Docket No. 950985B-TP) and the Prehearing Statement of Metropolitan Fiber Systems, Inc. (Docket No. 950985-TP).

Also enclosed is an extra copy of each document. Please date stamp the extra copies, and return them in the enclosed self-addressed envelope.

- ACK
- AFA
- APP
- CAF
- CMU Chase
- CTR
- EAG
- LEG J
- LIM 5 + orig. test.
- OPS cc: All parties of record
- RPT
- SEC 1
- WAS
- OTR

Accompanying the filing, pursuant to Rule 25-22.028, is a computer disk containing the Prehearing Statement.

Thank you for your attention to this matter.

Sincerely,
James C. Falvey
James C. Falvey

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Test
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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of December, 1995, a copy of the foregoing document was served, via federal express, upon the following parties:

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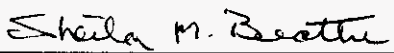
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Sheila M. Beattie

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

ORIG
FILE

Resolution of Petition(s) to establish)
nondiscriminatory rates, terms, and)
conditions for interconnection)
involving local exchange companies and)
alternative local exchange companies)
pursuant to Section 364.162, Florida)
Statutes)

Docket No. 950985-TP

Filed: December 11, 1995

PREHEARING STATEMENT OF
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.

Docket No. 950985-TP

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**PREHEARING STATEMENT OF
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.
Docket No. 950985-TP**

Pursuant to Rule 25-22.038(3), Florida Administrative Code and Order No. PSC-95-0888-PCO-TP, Metropolitan Fiber Systems of Florida, Inc. ("MFS-FL"), by its undersigned attorneys, hereby files this prehearing statement in the Commission's proceeding concerning its petition for interconnection with BellSouth Telecommunications, Inc. ("BellSouth" or "Southern Bell").

- (a) the name of all known witnesses that may be called by the party, and the subject matter of their testimony;**

Timothy T. Devine will testify as to the appropriate interconnection and other co-carrier arrangements (as defined by the list of issues in this proceeding) between MFS-FL and BellSouth and, in particular, the appropriate terminating access compensation mechanism. He will also respond to proposals by other parties on these issues.

- (b) a description of all known exhibits that may be used by the party, whether they may be identified on a composite basis, and the witness sponsoring each;**

Timothy T. Devine, on behalf of MFS-FL, will sponsor Exhibits TTD-1 through TTD-5 attached to his Direct and Rebuttal Testimony in this docket. Exhibit TTD-1 is the correspondence between BellSouth and MFS-FL in their recent interconnection negotiations. Exhibit TTD-2 is an affidavit of Timothy T. Devine. Exhibit TTD-3 is a list of processing and billing arrangements for interim number portability. Exhibit TTD-4 is a proposed stipulation of MFS-FL dated November 8, 1995. Exhibit TTD-5 is an interconnection agreement between MFS and Pacific Bell.

(c) a statement of basic position in the proceeding;

MFS-FL believes that the most efficient, administratively simple and equitable method of compensation for terminating access is the bill and keep method based on the in-kind exchange of traffic between co-carriers. This is the only method guaranteed to preclude a price squeeze. MFS-FL advocates other co-carrier arrangements in order to permit competitive entry without undue barriers to entry while keeping ALEC service transparent to end users, including: number resources arrangements; meet-point billing arrangements, including tandem subtending; reciprocal traffic exchange and reciprocal compensation; shared network platform arrangements; and local telephone number portability arrangements.

(d) MFS-FL offers the following prehearing positions on the questions of law, fact and public policy identified for disposition in this docket.

1. Issue: What are the appropriate rate structures, interconnection rates, or other compensation arrangements for the exchange of local and toll traffic between the respective ALECs and Southern Bell?

Position: The appropriate interconnection "rate" is the bill and keep method of traffic exchange whereby traffic is exchanged on a mutual basis with in-kind as opposed to cash compensation.

2. Issue: If the Commission sets rates, terms, and conditions for interconnection between the respective ALECs and Southern Bell, should Southern Bell tariff the interconnection rate(s) or other arrangements?

Position: Yes.

3. Issue: What are the appropriate technical and financial arrangements which should govern interconnection between the respective ALECs and Southern Bell for the delivery of calls originated and/or terminated from carriers not directly connected to the respective ALECs' network?

Position: MFS-FL supports the mutual exchange of traffic based on interconnection points (referred to by MFS-FL as Default Network Interconnection Points or "D-NIPs"), tandem subtending, and meet-point billing. Within each LATA, all carriers and BellSouth should jointly establish at least one mutually acceptable location as a D-NIP; all carriers would be permitted to interconnect at (or "sub-tend") the LEC tandem; and meet-point billing would follow established industry guidelines.

4. Issue: What are the appropriate technical and financial requirements for the exchange of intraLATA 800 traffic which originates from the respective ALECs' customer and terminates to an 800 number served by or through Southern Bell?

Position: New entrants have no ability to route 800 numbers to the appropriate local or long distance carrier. BellSouth should therefore be required to do a database dip and route ALEC 800 number calls to the appropriate carrier.

5. Issue: a) What are the appropriate technical arrangements for the interconnection of the respective ALECs' network to Southern Bell's 911 provisioning network such that the respective ALECs' customers are ensured the same level of 911 service as they would receive as a customer of Southern Bell?

b) What procedures should be in place for the timely exchange and updating of the respective ALECs' customer information for inclusion in appropriate E911 databases?

Position: a) BellSouth must provide trunk connections to its 911/E-911 selective routers/911 tandems for the provision of 911/E911 services and for access to all sub-tending Public Safety Answering Points ("PSAP"). Interconnection should be made at the D-NIP. BellSouth must also provide MFS-FL with the appropriate common language location identifier code and specifications of the tandem serving area. BellSouth must provide MFS-FL with the Master Street Address Guide so that MFS-FL can ensure the accuracy of the data transfer. Additionally, BellSouth should provide to MFS-FL the ten-digit POTS number of each PSAP which sub-tends each BellSouth selective router/9-1-1 tandem to which MFS-FL is interconnected. Finally, BellSouth should use its

best efforts to facilitate the prompt, robust, reliable, and efficient interconnection of MFS-FL systems to the 911/E911 platforms.

b) BellSouth should provide on-line access for immediate updates of the E-911 database. BellSouth should arrange for MFS-FL's automated input and daily updating of 911/E911 database information related to MFS-FL end users.

6. Issue: What are the appropriate technical and financial requirements for operator handled traffic flowing between the respective ALECs and Southern Bell including busy line verification and emergency interrupt services?

Position: Because ALECS and BellSouth should be able to interrupt calls in emergency situations, BellSouth should provide LEC-to-LEC Busy Line Verification and Interrupt ("BLV/I") trunks to one another to enable each carrier to support this functionality.

ALECs and BellSouth should compensate one another for the use of BLV/I according to the effective rates listed in BellSouth's federal and state access tariffs, as applicable.

7. Issue: What are the appropriate arrangements for the provision of directory assistance services and data between the respective ALECs and Southern Bell?

Position: The Commission should require BellSouth to list competing carriers' customers in their directory assistance databases and should require all carriers (both LECs and ALECs) to make their directory listings available to one another. In general, all LECs should be required to update their directory assistance databases with data provided by

competitors on at least as timely a basis as they update these databases with information regarding their own customers.

8. Issue: Under what terms and conditions should Southern Bell be required to list the respective ALECs' customers in its white and yellow pages directories and to publish and distribute these directories to the respective ALECs' customers?

Position: The Commission should require BellSouth to list competing carriers' customers in their White and Yellow Pages directories and should require BellSouth to distribute these directories to ALEC customers at no charge, in the identical and transparent manner in which it provides those functions for its own customers' telephone numbers (including the same level of confidentiality). MFS-FL should be provided the same rates, terms and conditions for enhanced listings (i.e., bolding, indention, etc.) as are provided to BellSouth customers. MFS-FL must provide BellSouth with its directory listings and daily updates to those listings in an industry-accepted format; BellSouth will provide MFS-FL a magnetic tape or computer disk containing the proper format. BellSouth will ensure that access to MFS-FL's customer proprietary confidential directory information will be limited solely to those BellSouth employees directly involved in the preparation of listings.

9. Issue: What are the appropriate arrangements for the provision of billing and collection services between the respective ALECs and Southern Bell, including billing and clearing, credit card, collect, third party and audiotext calls?

Position: Consolidated billing should be required where appropriate by providing for a single master bill for each wire center for calls provided by BellSouth's interim number portability service, that will enable an ALEC to re-bill its end users for collect, calling card, third-party billed and audiotext calls. Carriers should also be required to enter into mutual billing and collection agreements.

10. Issue: What arrangements are necessary to ensure the provision of CLASS/LASS services between the respective ALECs and Southern Bell's networks?

Position: ALECs and BellSouth should provide LEC-to-LEC CCS to one another, where available, in conjunction with LATA-wide traffic, in order to enable full interoperability of CLASS features and functions. All CCS signaling parameters should be provided, including automatic number identification, originating line information, calling party category, charge number, etc. BellSouth and MFS-FL should cooperate on the exchange of Transactional Capabilities Application Part ("TCAP") messages to facilitate full inter-operability of CCS-based features between their respective networks. CCS should be provided by Signal Transfer Point-to-Signal Transfer Point connections. Given that CCS will be used cooperatively for the mutual handling of traffic, link facility and link termination charges should be prorated 50% between the parties. For traffic for which CCS is not available, in-band multi-frequency, wink start, and E&M channel-associated

signaling will be forwarded. The originating carrier should also be required to transmit the privacy indicator where it applies.

11. Issue: What are the appropriate arrangements for physical interconnection between the respective ALECs and Southern Bell, including trunking and signaling arrangements?

Position: BellSouth should exchange traffic between its network and the networks of competing carriers using reasonably efficient routing, trunking, and signaling arrangements. ALECs and BellSouth should reciprocally terminate LATA-wide traffic originating on each other's network, via two-way trunking arrangements. These arrangements should be jointly provisioned and engineered. Moreover, each local carrier should be required to engineer its portion of the transmission facilities terminating at a D-NIP to provide the same grade and quality of service between its switch and the other carrier's network as it provides in its own network. MFS-FL and BellSouth should use their best collective efforts to develop and agree upon a Joint Interconnection Grooming Plan prescribing standards to ensure that trunk groups are maintained at this grade of service. Carriers should provide each other the same form and quality of interoffice signaling (*e.g.*, in-band, CCS, etc.) that they use within their own networks, and SS7 signaling should be provided where the carrier's own network is so equipped. The Feature Group D-like ("FGD-like") trunking arrangements used by either party to terminate

LATA-wide traffic may also be employed to terminate any other FGD traffic to that party, subject to payment of the applicable tariffed charges for such other traffic, *e.g.*, interLATA traffic.

12. Issue: To the extent not addressed in the number portability docket, Docket No. 950737-TP, what are the appropriate financial and operational arrangements for interexchange calls terminated to a number that has been "ported" to the respective ALECs?

Position: Switched access and local compensation should apply regardless of whether a call is completed using interim number portability. Only if the customers' carrier collects these revenues will competition be stimulated by interim number portability. BellSouth should therefore compensate ALECs as if the traffic had been terminated directly to the ALEC's network, except that certain transport elements should not be paid to ALECs to the extent that BellSouth will be transporting the call on its own network. Thus, for LATA-wide calls originating on BellSouth's network and terminating on MFS-FL's network, the effective inter-carrier compensation structure at the time the call is placed should apply. Traffic from IXC's forwarded to MFS-FL via temporary number portability should be compensated by BellSouth at the appropriate intraLATA, interLATA-intrastate, or interstate terminating access rate less those transport elements corresponding to the use of the BellSouth network to complete the call. Furthermore, MFS-FL believes that

procedures for the processing and billing of interim number portability should be established by the Commission in this proceeding.

13. Issue: What arrangements, if any, are necessary to address other operational issues?

Position: Each carrier should be required to provide the same standard of maintenance and repair service for its trunks terminating at the D-NIP as it does for interoffice trunks within its own network. Each carrier should be required to complete calls originating from another carrier's switch in the same manner and with comparable routing to calls originating from its own switches. The Commission should establish reasonable arrangements to address information services billing and collection, transfer of service announcements, coordinated repair calls, information pages, and the operator reference database.

14. Issue: What arrangements, if any, are appropriate for the assignment of NXX codes to the respective ALECs?

Position: As a co-carrier, MFS-FL is entitled to the same nondiscriminatory number resources as any Florida LEC under the Central Office Code Assignment Guidelines ("COCAG"). BellSouth, as Central Office Code Administrator for Florida, should therefore support all MFS-FL requests related to central office (NXX) code administration and assignments in an effective and timely manner. MFS-FL and BellSouth will comply

with code administration requirements as prescribed by the Federal Communications Commission, the Commission, and accepted industry guidelines.

(g) a statement of issues that have been stipulated to by the parties;

TCG has signed a stipulation with BellSouth. No other party, to MFS-FL's knowledge, has signed a similar agreement.

(h) a statement of all pending motions or other matters the party seeks action upon;

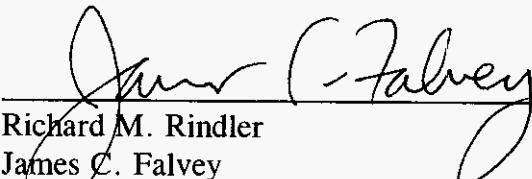
None.

(i) a statement as to any requirement set forth in this order that cannot be complied with, and the reasons therefor.

None.

Respectfully submitted,

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Dated: December 11, 1995