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February 21, 1996

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IN REPLY REFER TO:

Tallahassee



BY HAND DELIVERY

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Resolution of Petition to Establish Non Discriminatory Rates, Terms, and Conditions for resale Involving Local Exchange Companies and Alternative Local Exchange Companies pursuant to Section 364.161, Florida Statutes - Docket No. 950984-TP

Dear Ms. Bayo:

SEC __L WAS __ Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of United/Centel's Prehearing Statement. A copy of this document is included in WP 5.1 format on the accompanying disk.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition to)
Establish Non Discriminatory Rates,)
Terms, and Conditions for resale)
Involving Local Exchange)
Companies and Alternative Local)
Exchange Companies pursuant to)
Section 364.161, Florida Statutes)

DOCKET NO. 950984-TP

Filed: 2/21/96

UNITED AND CENTEL'S JOINT PREHEARING STATEMENT

Pursuant to the Order on Prehearing Procedure in this docket, Central Telephone Company of Florida ("Sprint/Centel") and United Telephone Company of Florida ("Sprint/United") (collectively the "Companies"), through their undersigned counsel, file their Joint Prehearing Statement.

- A. <u>WITNESS</u>: The companies will offer the prepared direct testimony and rebuttal testimony of F. Ben Poag, and the prepared rebuttal testimony of Sandra A. Khazraee.
- **B. EXHIBITS:** The Companies will offer the Composite Exhibit of Sandra A. Khazraee (SAK-1), consisting of 2 documents.
- c. <u>BASIC POSITION</u>: The unbundled elements of the Companies' special access tariff represent the elements that would be provided to ALECs on an unbundled basis. Unbundled services should be priced consistent with the Companies' special access tariffs. The technical arrangements contained in the Companies' special access tariff represent the basics of the required technical arrangements. It is not necessary for the Commission to address other detailed operational issues at this time.

DOCUMENT NUMBER-DATE

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D-G. ISSUES AND POSITIONS:

ISSUE 1. What elements should be made available by Sprint-United/Centel to the ALECs on an unbundled basis (e.g., link elements, port elements, loop concentration, loop transport)?

<u>Position</u>: The unbundled elements of the Companies' special access tariff represent the elements that would be provided to ALECs on an unbundled basis. In addition, the Companies propose to provide unbundled ports which provide the capability to originate and/or terminate local, long distance, directory assistance, operator, and 911 type calls.

ISSUE 2. What are the appropriate technical arrangements for the provision of such unbundled elements?

<u>Position</u>: The technical arrangements contained in the Companies' special access tariff represent the basics of the required technical arrangements.

ISSUE 3. What are the appropriate financial arrangements for each such unbundled element?

<u>Position</u>: Unbundled services should be priced consistent with the Companies' special access tariffs. Doing so will allow the Companies to provide similar services on a nondiscriminatory basis to ALECs, IXCs, AAVs, and cellular providers at the same rates, terms and conditions.

ISSUE 4. What arrangements, if any, are necessary to address other operational issues?

<u>Position</u>: It is not necessary for the Commission to address other detailed operational issues at this time. Sprint-United/Centel are willing to work in good faith with MFS and other ALECs to address their operational concerns.

ISSUE 5 (legal):

To what extent are the non-petitioning parties that actively participate in this proceeding bound by the Commission's decision in this docket as it relates to Sprint-United/Centel?

<u>POSITION</u>: All entities that participate in the proceedings between the petitioner and Sprint-United/Centel should be bound by the Commission's decision, <u>i.e.</u>, If and when the seek to purchase unbundled services with the Sprint-United/Centel, they should be required to pay and abide by the rates, terms and conditions set in this proceeding for Sprint-United/Centel¹.

- H. <u>STIPULATIONS</u>: The Companies are not aware of any pending stipulations at this time.
- I. <u>PENDING MOTIONS</u>: Except for United Telephone Company of Florida and Central Telephone Company of Florida's Motion on Issues and Parties, which was filed contemporaneously with this prehearing statement, the Companies are not aware of any pending motions at

¹This is a new issue and is being raised in this prehearing statement consistent with United Telephone Company of Florida and Central Telephone Company of Florida's Motion on Issues and Parties, filed contemporaneous with this prehearing statement.

this time. The Companies request that the Prehearing Officer hear and rule on this motion at the Prehearing Conference.

J. <u>COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE</u>: The Companies do not know of any requirement of the Order on Prehearing Procedure with which they cannot comply.

DATED this 21st day of February, 1996.

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ATTORNEYS FOR CENTRAL TELEPHONE COMPANY OF FLORIDA AND UNITED TELEPHONE COMPANY OF FLORIDA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 21st day of February, 1996, to the following:

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