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January 30, 1998

Ms. Blanca S. Bayó
Director, Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket 970526-TP

Dear Ms. Bayó:

Enclosed for filing in the above docket on behalf of MCI Telecommunications Corporation are the original and 15 copies of MCI's Prehearing Statement together with a Word diskette.

By copy of this letter this document has been provided to the parties on the attached service list.

Very truly yours,



Richard D. Nelson

- ACK _____
- AEA _____
- APP _____
- CAF _____
- CIN Dubo
- CTR _____
- EAC _____
- LEB 1 cc: Service List
- LIN 5
- CEL _____
- RCP _____
- SE 1
- WAS _____
- OTH _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U. S. Mail this 30th day of January 1998.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic Consideration of)
Incumbent Local Exchange (ILEC)) Docket No. 970526-TP
Business Office Practices and Tariff)
Provisions in the Implementation of) Filed: January 30, 1998
IntraLATA Presubscription)

MCI'S PREHEARING STATEMENT

MCI Telecommunications Corporation (MCI) hereby files its prehearing statement in accordance with the requirements of Order No. PSC-98-0010-PCO-TP.

A. Known Witnesses. MCI has prefiled the direct testimony of Tom Hyde.

B. Known Exhibits. MCI has prefiled no exhibits. MCI reserves the right to use exhibits for purposes of cross-examination.

C. Basic Position. MCI believes that it is necessary for the Commission to insure that the local monopoly advantage cannot be used to unfairly disadvantage potential competitors in the intraLATA market. In addition, due to the overlap in work processes and activities, there is a significant costs savings when both the interLATA and intraLATA carriers are changed at the same time to the same carrier. The Commission should approve a rate additive for 2 for 1 PIC of no more than 30%.

D.-F. ISSUES.

Issue Number 1: Should the Commission prohibit GTEFL, Sprint-LEC, and the small ILECs (include specific names) from

utilizing terminology that suggest ownership of the intra-LATA toll calling area when referring to the intralATA service areas in directories and bill inserts?

MCI's Position: Yes.

Issue Number 2: Should the Commission require GTEFL, Sprint-LEC, and the small ILECs to place a new customer who is undecided regarding a choice of intralATA carrier in a no-PIC status until such a choice is made?

MCI's Position: Yes.

Issue Number 3: Should the Commission require GTEFL, Sprint-LEC, and the small ILECs to put in place competitively-neutral customer contact protocols for:

a: Communicating information to new customers regarding intralATA choices:

MCI's Position: Yes.

b: ILEC processing of all PIC change orders of its customers?

MCI's Position: Yes.

c. [Staff Issue 4a.] ILECs' ability to market their service to existing customers changing their intralATA carriers? If so, for what period of time should any such requirements be imposed?

MCI's Position: Yes, for 18 months.

d. [Staff's issue 4b) ILECs' ability to market their intralATA services to existing customers when they call for reasons other than selecting intralATA carriers? If so, for what period of time should any such requirements be imposed?

MCI's Position: Yes, for 18 months.

Issue 4 [Staff Issue 5]: Should the Commission require the ILECs to provide one free PIC to existing customers?

MCI's Position: Yes.

Issue Number 5: Should the Commission require GTEFL, Sprint-LEC and the small ILECs to provide two-for-one PIC to existing customers.

MCI's Position: Yes. Due to the overlap in work processes and activities, there is a significant costs savings when both the interLATA and intraLATA carriers are changed at the same time to the same carrier. The Commission should approve a rate additive for 2 for 1 PIC of no more than 30¢.

G. Stipulations. There are no stipulations between MCI and any party at this time.

H. Pending Motions. MCI has no pending motions at this time.

I. Requirements of Order on Procedure. MCI believes that this prehearing statement complies with all the requirements of the Order on Procedure.

RESPECTFULLY SUBMITTED this 30th day of January, 1998.

HOPPING GREEN SAMS & SMITH, P.A.

By: 

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