

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for arbitration concerning complaint of MCImetro Access Transmission Services LLC and MCI WorldCom Communications, Inc. against BellSouth Telecommunications, Inc. for breach of approved interconnection agreement.

DOCKET NO. 991755-TP

DATE: JULY 17, 2000

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-00-1000-PCO-TP, issued May 19, 2000, 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 Issues

- APP _____
- CAF _____
- CMP _____
- COM 3
- CTR _____
- ECR _____
- LEG _____
- OPC _____
- PAI _____
- RGO _____
- SEC I
- SER _____
- OTH _____

ISSUE 1: Under FCC Rule 51.711, would MCIm and MWC be entitled to be compensated at the sum of the tandem interconnection rate and the end office interconnection rate for calls terminated on their switches if those switches serve a geographic area comparable to the area served by BellSouth's tandem switches?

Position

Staff takes no position at this time.

DOCUMENT NUMBER-DATE

08602 JUL 178

FPSC-RECORDS/REPORTING

ISSUE 2: Do MCIm's and MWC's switches serve geographic areas comparable to those served by BST tandem switches?

Position

Staff takes no position at this time.

ISSUE 3: Should BellSouth be required, pursuant to Part A Section 2.2 or 2.4 of the interconnection agreement, to execute amendments to its interconnection agreements with MCIm and MWC requiring BellSouth to compensate MCIm and MWC at the sum of the tandem interconnection rate and the end office interconnection rate for calls terminated on their switches that serve a geographic area comparable to the area served by BellSouth's tandem switches?

Position

Staff takes no position at this time.

ISSUE 4: Are MCIm and MWC entitled to a credit from BellSouth equal to the additional per minute amount of the tandem interconnection rate from January 25, 1999 to the earlier of (i) the date such amendments are approved by the Commission, or (ii) the date the interconnection agreements are terminated?

Position

Staff takes no position at this time.

e. Pending Motions

None.

f. Pending Confidentiality Claims or Requests

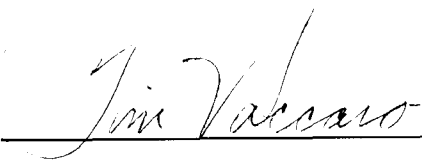
None.

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g. Compliance with Order No. PSC-00-1000-PCO-TP

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 17th day of July, 2000.



TIM VACCARO
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(850) 413-6199

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing
Staff's Prehearing Statement has been furnished by U.S. Mail to all
parties of record this 17th day of July, 2000.

Nancy White, Esquire
c/o Nancy H. Sims
BellSouth Telecommunications,
Inc.
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556

Ms. Donna C. McNulty
General Counsel
MCI WorldCom Communications,
Inc.
325 John Knox Road
Suite 105
Tallahassee, FL 32303-4131

Richard D. Melson, Esquire
Hopping Green Sams & Smith
Law Firm
123 South Calhoun Street
Tallahassee, FL 32301



TIM VACCARO
Staff Counsel

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