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September 29, 1995

BY HAND DELIVERY

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

Re: Docket No. 950985-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Metro Access Transmission Services, Inc. (MCImetro) in the above referenced docket are the original and 15 copies of MCImetro's prehearing statement. A WordPerfect 5.1 disk containing the document is also enclosed.

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

Very truly yours,



Richard D. Melson

RDM/cc
Enclosures
cc: Parties of Record

DOCUMENT NUMBER-DATE
09713 SEP 29 95
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish nondiscriminatory rates,))
terms, and conditions for) Docket No. 950985-TP
interconnection involving local)
exchange companies and alternative) Filed: September 29, 1995
local exchange companies pursuant to)
Section 364.162, Florida Statutes.)
_____)

MCI METRO ACCESS TRANSMISSION SERVICES, INC.'S
PREHEARING STATEMENT

MCI Metro Access Transmission Services, Inc. (MCImetro)
hereby submits its Prehearing Statement in the above-captioned
docket.

A. Known Witnesses. MCImetro has prefiled the testimony
of the following witness:

Dr. Nina Cornell	Direct	All Issues
Dr. Nina Cornell	Rebuttal	All Issues

B. Known Exhibits. MCImetro has the following direct
exhibit. MCImetro reserves the right to use additional exhibits
for the purpose of cross-examination.

Cornell Direct	NWC-1	Academic and Professional Qualifications of Dr. Nina Cornell
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C. Basic Position. The appropriate arrangement for the
exchange of local traffic between Southern Bell and any ALEC is
mutual traffic exchange in which the parties have co-carrier
status and compensate each other "in kind" by terminating local
traffic from the other party without explicit compensation. The
appropriate arrangement for the exchange of toll traffic between

Southern Bell and any ALEC is the payment of terminating access charges by the carrier originating the traffic to the carrier terminating the traffic. All arrangements for termination of local traffic and other related matters should be tariffed. However, the tariffing of a specific arrangement negotiated by one set of parties should not preclude the tariffing of other arrangements that may be negotiated by other parties nor should it set a precedent for Commission action in the event another set of parties is unable to reach a negotiated agreement and petitions the Commission to resolve their dispute.

D-F. Issues. MCImetro's positions on the issues identified by the parties at the informal issue identification meeting are as follows:

Issue 1. What is (are) the appropriate interconnection rate structure(s), interconnection rate(s), or other arrangements, for the exchange of local and toll traffic between Teleport and Southern Bell?

MCImetro: The appropriate arrangement for exchange of local traffic between Southern Bell and Teleport, or any other ALEC, is mutual traffic exchange in which the parties have co-carrier status and compensate each other "in kind" by terminating traffic from the other party without cash compensation. The appropriate basis for exchange of toll traffic is for the company originating the traffic to pay terminating access charges to the company terminating the traffic.

Issue 2. Should Southern Bell tariff the interconnection rate(s) or other arrangements?

MCImetro: Yes, interconnection rates or other arrangements should be tariffed and should be available on a non-discriminatory basis to all parties similarly situated. The tariffing of one set of rates or arrangements should not create a presumption against the LEC's ability to offer and tariff alternative sets of rates or arrangements.

Issue 3. What are the appropriate technical and financial meet point billing arrangements which should govern interconnection between TCG and BellSouth for the delivery of calls originated and/or terminated from interexchange carriers not directly connected to TCG's network?

MCImetro: MCImetro takes no position on the appropriate arrangements for Southern Bell and TCG, except that they should not set a precedent for arrangements between Southern Bell and other parties. MCImetro is still negotiating with Southern Bell on this and other issues and reserves the right to petition the Commission for relief in the event it does not reach a satisfactory arrangement.

Issue 4. What are the appropriate technical and financial requirements for the exchange of intraLATA 800 traffic which originates from a TCG customer and terminates to an 800 number served by BellSouth?

MCImetro: MCImetro takes no position on the appropriate requirements for Southern Bell and TCG, except that they should not set a precedent for arrangements between Southern Bell and other parties. MCImetro is still negotiating with Southern Bell on this and other issues and reserves the right to petition the Commission for relief in the event it does not reach a satisfactory arrangement.

Issue 5. What are the appropriate technical arrangements for the interconnection of TCG's network to BellSouth's 911 provisioning network such that TCG's customers are ensured the same level of 911 service as they would receive as a customer of BellSouth? What procedures should be in place for the timely exchange and updating of TCG customer information for inclusion in appropriate E911 databases?

MCImetro: MCImetro takes no position on the appropriate arrangements for Southern Bell and TCG, except that they should not set a precedent for arrangements between Southern Bell and other parties. MCImetro is still negotiating with Southern Bell on this and other issues and reserves the right to petition the Commission for relief in the event it does not reach a satisfactory arrangement.

Issue 6. What are the appropriate technical requirements for operator traffic flowing between TCG's operator services provider and BellSouth's operator services provider including busy line verification and emergency interrupt services?

MCImetro: MCImetro takes no position on the appropriate arrangements for Southern Bell and TCG, except that they should not set a precedent for arrangements between Southern Bell and other parties. MCImetro is still negotiating with Southern Bell on this and other issues and reserves the right to petition the Commission for relief in the event it does not reach a satisfactory arrangement.

Issue 7. Under what terms and conditions should BellSouth be required to list TCG's customers in its directory assistance database?

MCImetro: MCImetro takes no position on the appropriate arrangements for Southern Bell and TCG, except that they should not set a precedent for arrangements between Southern Bell and other parties. MCImetro is still negotiating with Southern Bell on this and other issues and reserves the right to petition the Commission for relief in the event it does not reach a satisfactory arrangement.

Issue 8. Under what terms and conditions should BellSouth be required to list TCG's customers in its universal white and yellow pages directories and to publish and distribute these directories to TCG's customers?

MCImetro: MCImetro takes no position on the appropriate arrangements for Southern Bell and TCG, except that they should not set a precedent for arrangements between Southern Bell and other parties. MCImetro is still negotiating with Southern Bell on this and other issues and reserves the right to petition the Commission for relief in the event it does not reach a satisfactory arrangement.

Issue 9. What arrangements are necessary to ensure that TCG can bill and clear credit card, collect, third party calls and audiotext calls?

MCImetro: MCImetro takes no position on the appropriate arrangements for Southern Bell and TCG, except that they should not set a precedent for arrangements

between Southern Bell and other parties. MCImetro is still negotiating with Southern Bell on this and other issues and reserves the right to petition the Commission for relief in the event it does not reach a satisfactory arrangement.

Issue 10. What arrangements are necessary to ensure the provision of CLASS/LASS services between interconnected and networks?

MCImetro: MCImetro takes no position on the appropriate arrangements for Southern Bell and TCG, except that they should not set a precedent for arrangements between Southern Bell and other parties. MCImetro is still negotiating with Southern Bell on this and other issues and reserves the right to petition the Commission for relief in the event it does not reach a satisfactory arrangement.

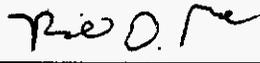
H. Stipulations. MCImetro is not aware of any issues that have been stipulated by the parties.

I. Pending Motions. MCImetro has no pending motions that require action by the Commission.

J. Requirements of Order. MCImetro believes this prehearing statement is fully responsive to the requirements of the Order on Prehearing Procedure.

RESPECTFULLY SUBMITTED this 29th day of September, 1995.

HOPPING GREEN SAMS & SMITH, P.A.

By: 
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by hand delivery (**) or next business day delivery by UPS (*) this 29th day of September, 1995.

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