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3<sup>PM</sup>



Florida Cable Telecommunications Association

Steve Wilkerson, President

ORIGINAL  
FILE COPY

December 11, 1995

VIA HAND DELIVERY

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

RE: **DOCKET NO. 950984-TP**

Dear Ms. Bayo:

Enclosed for filing in the above-captioned docket are an original and fifteen copies of Florida Cable Telecommunications Association, Inc.'s ("FCTA") Prehearing Statement. Copies have been served on the parties of record pursuant to the attached certificate of service.

Also enclosed is a copy on a 3-1/2" diskette in WordPerfect format, version 5.1.

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

ACK  Thank you for your assistance in processing this filing.

AFA \_\_\_\_\_ Yours very truly,

APP \_\_\_\_\_

CAF \_\_\_\_\_  
CML *[Signature]*

CTR \_\_\_\_\_ Laura L. Wilson  
Vice President, Regulatory Affairs  
& Regulatory Counsel

EAG \_\_\_\_\_  
LEG 1 \_\_\_\_\_  
LIR 5 Enclosures

OPC \_\_\_\_\_ cc: Mr. Steven E. Wilkerson  
RCH \_\_\_\_\_ All Parties of Record

SEC 1 \_\_\_\_\_

WAS \_\_\_\_\_

OTH \_\_\_\_\_

RECEIVED 8 11 95

*[Handwritten signature]*

DOCUMENT NUMBER-DATE

310 North Monroe Street • Tallahassee, Florida 32301 • (904) 681-1990 FAX (904) 681-2428 DEC 11 95

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Resolution of Petition(s) to Establish )  
Nondiscriminatory Rates, Terms, and )  
Conditions for Resale Involving Local )  
Exchange Companies Pursuant to Section )  
364.161, Florida Statutes )  
\_\_\_\_\_ )

DOCKET NO. 950984-TP  
FILED: December 11, 1995

**FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION, INC.'S  
PREHEARING STATEMENT**

The Florida Cable Telecommunications Association, Inc., pursuant to Rule 25-22.038(3), Florida Administrative Code, respectfully submits the following Prehearing Statement in the above-captioned docket.

**A. WITNESSES**

FCTA does not intend to present any witnesses at this time.

**B. EXHIBITS**

FCTA does not intend to sponsor any exhibits at this time.

**C. BASIC POSITION**

The FCTA urges the adoption of the comprehensive Stipulation and Agreement entered between FCTA, BellSouth, Continental and Time Warner AxS L.P./Digital Media Partners which was filed in this docket on December 8, 1995. Part of the Stipulation and Agreement addresses the terms of LEC unbundling and resale. The Stipulation and Agreement is in the public interest and will permit the introduction of local competition to Florida's consumers.

DOCUMENT NUMBER-DATE

12428 DEC 11 95

FPSC-RECORDS/REPORTING 150

#### **D. ISSUES AND POSITIONS**

FCTA offers the following prehearing positions on the questions of law, fact and public policy identified for disposition in this docket:

**ISSUE 1:      What elements should be made available by BellSouth to MCIMetro and MFS on an unbundled basis (e.g., link elements, port elements, loop concentration, loop transport)?**

**POSITION:**

The FCTA would urge the adoption of the December 8, 1995 comprehensive Stipulation and Agreement entered into between FCTA, BellSouth, Continental, Time Warner AxS L.P./Digital Media Partners. The terms of the agreement that relate to LEC unbundling and resale are contained in Section B and in Attachment D. That agreement, taken as a whole, establishes reasonable provisions for LEC unbundling and resale over the next two years.

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

**POSITION:**

The FCTA urges the adoption of the December 8, 1995 comprehensive Stipulation and Agreement entered between FCTA, BellSouth, Continental, Time Warner AxS L.P./Digital Media Partners in its entirety. In Section B and in Attachment D of the Agreement, an initial set of technical arrangements is established that will facilitate the introduction of local competition.

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

**POSITION:** FCTA urges the adoption of the December 8, 1995 comprehensive Stipulation and Agreement entered between FCTA, BellSouth, Continental, Time Warner AxS L.P./Digital Media Partners in its entirety. The initial set of financial arrangements necessary to introduce local competition are contained in Section B and in Attachment D of the Agreement.

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

**POSITION:** FCTA urges the adoption of the September 8, 1995 comprehensive Stipulation and Agreement entered between FCTA, BellSouth, Continental, and Time Warner AxS L.P./Digital Media Partners in its entirety. The initial arrangements necessary to introduce local competition are contained in Section B and Attachment B of the agreement.

#### **E. STIPULATIONS**

A Stipulation and Agreement was filed on December 8, 1995 between FCTA, BellSouth, Time Warner AxS L.P./Digital Media Partners and Continental.

#### **F. PENDING MOTIONS**

On December 8, 1995, the FCTA, BellSouth, Time Warner AxS L.P./Digital Media Partners and Continental filed a joint Motion to Accept Stipulation and Agreement and for Partial Stay.

#### **G. OTHER REQUIREMENTS**

FCTA is not aware of any other requirements of the procedural prehearing order with which it can not comply.

**RESPECTFULLY SUBMITTED** this 11th day of December, 1995.



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Laura L. Wilson  
Florida Cable Telecommunications Association, Inc.  
310 N. Monroe Street  
Tallahassee, FL 32301  
(904) 681-1990

**CERTIFICATE OF SERVICE**  
**DOCKET NO 950984-TP**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing been furnished by Hand Delivery(\*) and/or U.S. Mail on this 11th day of Decemberr, 1995 to the following parties of record:

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**DOCKET NO. 950984-TP**

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