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December 9, 1997

BY HAND DELIVERY

Ms. Blanca Bayo, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket Nos. 960757-TP, 960833-TP, and 960846-TP

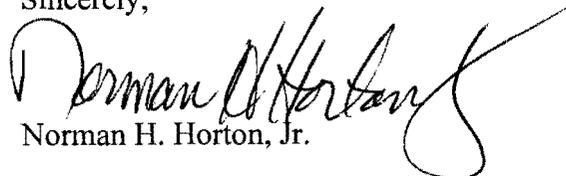
Dear Ms. Bayo:

Enclosed for filing are an original and fifteen copies of Prehearing Statement of American Communications Services of Jacksonville, Inc. in the above-referenced dockets. Also enclosed is a 3 1/2" diskette with the document on it in Word Perfect 6.0/6.1 format.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

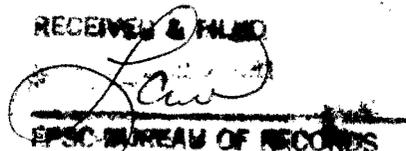
Thank you for your assistance with this filing.

Sincerely,


Norman H. Horton, Jr.

ACK _____
AFA _____
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG _____
LIN _____
OPC _____
RCH _____
SEC _____
WAS _____
OTH _____

NIH:amb
Enclosures
cc: James C. Falvey, Esq.
Parties of Record

RECEIVED & FILED

FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
12576 DEC-95
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Metropolitan Fiber
Systems of Florida, Inc. for arbitration
with BellSouth Telecommunications, Inc.
concerning interconnection rates, terms and
conditions, pursuant to the Federal
Telecommunications Act of 1996
_____)
)

Docket No. 960757-TP

In re: Petition by AT&T Communications
of the Southern States, Inc. for arbitration
of certain terms and conditions of a
proposed agreement with BellSouth
Telecommunications, Inc. concerning
interconnection and resale under the
Telecommunications Act of 1996.
_____)
)

Docket No. 960833-TP

In re: Petition by MCI Telecommunications
Corporation and MCI Metro Access
Transmission Services, Inc. for arbitration
of certain terms and conditions of a proposed
agreement with BellSouth Telecommunications,
Inc. concerning interconnection and resale under
the Telecommunications Act of 1996.
_____)
)

Docket No. 960846-TP
Served: December 9, 1997

**PREHEARING STATEMENT OF
AMERICAN COMMUNICATION SERVICES, INC.**

American Communication Services, Inc. and American Communication Services
of Jacksonville, Inc. ("ACSI"), through undersigned counsel, respectfully submits its prehearing
statement.

A. APPEARANCES

Floyd R. Self, Esq. and Norman H. Horton, Jr., Esq.
Messer, Caparello, & Self, P.A.
Post Office Box 1876
Tallahassee, FL 32302-1876

On behalf of American Communication Services, Inc.

DOCUMENT NUMBER-DATE

12576 DEC-96

FPSC-RECORDS/REPORTING

B. WITNESSES

Witness
Dr. Marvin H. Kahn
(Rebuttal Testimony)

Issues
All addressed by ACSI

C. EXHIBITS

| Number | Witness | Description |
|--------|---------|-------------|
| MHK-1 | Kahn | Resume |

D. BASIC POSITION

BellSouth's proposed rates include unnecessary services and work functions which results in rates being set at inappropriate levels. The Commission should reject the proposal of BellSouth.

E. ISSUES AND POSITIONS

ISSUE 1: What are the appropriate permanent recurring and non-recurring rates for the following unbundled network elements:

ISSUE 1.A.: Network interface device (NID).

ACSI's Position: This is not an element which ACSI can address in this proceeding.

ISSUE 1.B.: 2-wire/4-wire Loop Distribution.

ACSI's Position: This is not an element which ACSI can address in this proceeding.

ISSUE 1.C.: Virtual collocation.

ACSI's Position: The rates for the cross-connect element proposed by BellSouth do not reflect the appropriate forward looking costs and should be rejected. ACSI should have the opportunity to self provision cross connect with BellSouth labor to the extent required. ACSI should also have the opportunity to replace BellSouth labor with certified employees where possible.

ISSUE 1.D.: Physical collocation.

ACSI's Position: The rates for the cross-connect element proposed by BellSouth do not reflect the appropriate forward looking costs and should be rejected. ACSI should have the opportunity to self provision cross connect with BellSouth labor to the extent required. ACSI should also have the opportunity to replace BellSouth labor with certified employees where possible.

ISSUE 1.E.: Directory Assistance.

ACSI's Position: This is not an element which ACSI can address in this proceeding.

ISSUE 1.F.: Dedicated transport (Nonrecurring only).

ACSI's Position: This is not an element which ACSI can address in this proceeding.

ISSUE 1.G.: 4-wire analog port.

ACSI's Position: This is not an element which ACSI can address in this proceeding.

ISSUE 1.H.: 2-wire ADSL-compatible loop.

ACSI's Position: BellSouth's proposed recurring and nonrecurring charges are excessive as they include inappropriate costs. Absent proof to the contrary, ACSI's interim rates should be adopted as they were agreed to by BellSouth which had a favorable, strong negotiating position. The Commission should not consider any dramatic deviation from those interim rates.

ISSUE 1.I.: 2-wire/4-wire HDSL-compatible loop.

ACSI's Position: BellSouth's proposed recurring and nonrecurring charges are excessive as they include inappropriate costs. Absent proof to the contrary, ACSI's interim rates should be adopted as they were agreed to by BellSouth which had a favorable, strong negotiating position. The Commission should not consider any dramatic deviation from those interim rates.

**F. PENDING MOTIONS FILED BY
AMERICAN COMMUNICATION SERVICES, INC.**

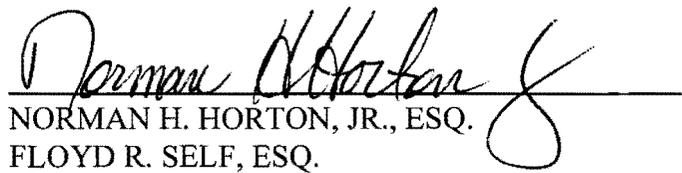
American Communication Services, Inc. has no pending motions at this time.

G. REQUIREMENTS THAT CANNOT BE COMPLIED WITH

American Communication Services, Inc. knows of no requirements that cannot be complied with.

Dated this 9th day of December, 1997.

Respectfully submitted,
MESSER, CAPARELLO, & SELF, P.A.
Post Office Box 1876
Tallahassee, FL 32302-1876
(904) 222-0720


NORMAN H. HORTON, JR., ESQ.
FLOYD R. SELF, ESQ.

Attorneys for American Communication Services, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of Prehearing Statement of American Communications Services of Jacksonville, Inc. in Docket Nos. 960757-TP, 960833-TP, and 960846-TP have been served upon the following parties by Hand Delivery (*) and/or U. S. Mail this 9th day of December, 1997.

Monica Barone, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

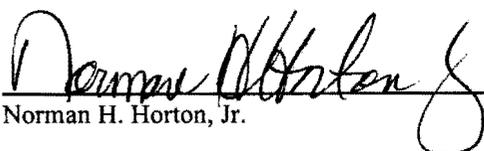
Ms. Nancy White*
c/o Ms. Nancy Sims
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Norman H. Horton, Jr.