



JACK SHREVE
PUBLIC COUNSEL

STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400
904-488-9330

July 8, 1993

Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Re: Docket No. 921074-TP

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket on behalf of the Citizens of the State of Florida are the original and 15 copies of the Citizens' Prehearing Statement.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Enclosures

ACK ✓
AFA 1
APP _____
CAF _____
CMU 1
CTR _____
EAG _____
LEG 1
LPI 6
OPS _____
RCH _____
SEC 1
WAS _____
OTH _____

Sincerely,

Charles J. Beck
Charles J. Beck
Deputy Public Counsel

DOCUMENT NUMBER-DATE

07279 JUL-8 93

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Intermedia Communications)
of Florida, Inc. for Expanded Interconnection)
for AAVs within LEC Central Offices)

Docket No. 921074-TP
Filed July 8, 1993

CITIZENS' PREHEARING STATEMENT

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, file this Prehearing Statement pursuant to Commission order no. PSC-93-0811-PCO-TP issued May 26, 1993.

Witnesses

The Citizens do not have a witness.

Exhibits

The Citizens have no exhibits to identify at this time.

Statement of Basic Position

The Citizens wish to hear and consider all evidence from the hearing before taking an overall position in this case.

Issues and positions

Issue 1. Is expanded interconnection for special access

DOCUMENT NUMBER-DATE

07279 JUL-83

FPSC-RECORDS/REPORTING

and/or private line in the public interest?

Citizens' Position: No position at this time.

Issue 2. How does the FCC's order on expanded interconnection impact the Commission's ability to impose forms and conditions of expanded interconnection that are different from those imposed by the FCC's order.

Citizens' Position: No position at this time.

Issue 3. Under what circumstances should the Commission impose different forms and conditions of expanded interconnection?

Citizens' Position: No position at this time.

Issue 4. Does Chapter 364 Florida Statutes allow the Commission to require expanded interconnection?

Citizens' Position: Yes.

Issue 5. Does a physical collocation mandate raise federal and/or state constitutional questions about the taking or confiscation of LEC property?

Citizens' Position: No position at this time.

Issue 6. Should the Commission require physical and/or virtual collocation?

Citizens' Position: No position at this time.

Issue 7. What LECs, if any, should be required to provide expanded interconnection?

Citizens' Position: No position at this time.

Issue 8. Where should expanded interconnection be offered?

Citizens' Position: No position at this time.

Issue 9. Who should be allowed to interconnect?

Citizens' Position: No position at this time.

Issue 10. Should the same terms and conditions of expanded interconnection apply to AT&T as apply to other interconnection?

Citizens' Position: AT&T should receive no advantage as a result of a Commission decision on interconnection of facilities.

Issue 11. Should the Commission require standards for physical and/or virtual collocation? If so, what should they be?

Citizens' Position: No position at this time.

Issue 12. Should collocators be required to allow LECs and other parties to interconnect with their networks?

Citizens' Position: Yes.

Issue 13. What standards should be established for the LECs to allocate space for collocators?

Citizens' Position: If it is determined that collocation is in the public interest, the LECs should be required to provide space on an as-available basis for collocation subject to appropriate security measures to insure protection of the public switched network from unauthorized access. In the event that space is not available within a central office, the LECs should be required to provide external co-location, such as a cross-box outside the central office utilizing central office power for transmission and environmental controls.

Issue 14. Should the Commission allow expanded interconnection for non-fiber optic technology?

Citizens' Position: Technology should not be the

determining factor in the decision by this Commission to require physical collocation and/or virtual collocation.

Issue 15. If the Commission permits expanded interconnection, what pricing flexibility should the LECs be granted for special access and private line services?

Citizens' Position: If allowed at all, downward pricing flexibility should only be granted for competitive services, such as DS-3. No price increases should be allowed as a result of this docket.

Issue 16. If the Commission permits collocation, what rates, terms, and conditions should be tariffed by the a LEC?

Citizens' Position: No position at this time.

Issue 17. Should all special access and private line providers be required to file tariffs?

Citizens' Position: No position at this time.

Issue 18. What separations impact will expanded interconnection have on the LECs?

Citizens' Position: No position at this time.

Issue 19. How would ratepayers be financially affected by expanded interconnection?

Citizens' Position: Users of AAV services should obtain lower prices and higher quality service.

Issue 20. Should the Commission grant ICI's petition?

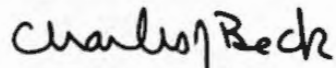
Citizens' Position: No position at this time.

Issue 21. Should expanded interconnection be subject to a "net revenue test" requirement in order to avoid possible cross-subsidy concerns?

Citizens' Position: No position at this time.

Respectively submitted,

JACK SHREVE
Public Counsel


Charles J. Beck
Deputy Public Counsel

Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Attorneys for the Citizens
of the State of Florida

**CERTIFICATE OF SERVICE
DOCKET NO. 921074-TF**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 8th day of July, 1993.

Patrick K. Wiggins
Intermedia Communications
of Florida, Inc.
9280 Bay Plaza Blvd., Suite 720
Tampa, FL 33619

C. Dean Kurtz
Central Telephone Company
of Florida
P.O. Box 2214
Tallahassee, FL 32316

Lee L. Willis
John P. Fons
Ausley, McMullen, McGehee,
Carothers & Proctor
227 S. Calhoun Street
P.O. Box 391
Tallahassee, FL 32302

Joseph P. Gillan
J.P. Gillan & Associates
P.O. Box 541038
Orlando, FL 32854-1038

Peter M. Dunbar
Haben, Culpepper, Dunbar
& French, P.A.
P.O. Box 10095
Tallahassee, FL 32302

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Ervin
305 S. Gadsden Street
Tallahassee, FL 32301

Paul Jones
Time Warner Cable
Corporate Headquarters
300 First Stamford Place
Stamford, CT 06902-6732

Tracy Hatch
Division of Legal Services
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

Thomas Parker
Associate General Counsel
GTE Florida Incorporated
P.O. Box 110, MC 7
Tampa, FL 33601

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff & Reeves
315 S. Calhoun St.
Tallahassee, FL 32301

Brad E. Mutschelknaus
Danny E. Adams
Rachel J. Rothstein
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

Michael W. Tye
106 E. College Ave., Suite 1410
Tallahassee, FL 32301

Chanthina R. Bryant
Sprint
3065 Cumberland Circle
Atlanta, GA 30339

David B. Erwin
Young, van Assenderp, Varnadoe
& Benton, P.A.
P.O. Box 1833
Tallahassee, FL 32302

Jodie L. Donovan
Regulatory Counsel
Teleport Communications Group,
Inc.
1 Teleport Drive, Suite 301
Staten Island, NY 10311

Jeff McGehee
Southland Telephone Company
P.O. Box 37
Atmore, AL 36504

F. Ben Poag
United Telephone Company of
Florida
P.O. Box 165000
Altamonte Springs, FL 32716-5000

John A. Carroll, Jr.
Northeast Florida Telephone
Company
P.O. Box 485
Macclenny, FL 32063-0485

Daniel V. Gregory
Quincy Telephone Company
P.O. Box 189
Quincy, FL 32351

Charles J. Beck
Charles J. Beck
Deputy Public Counsel