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September 29, 1995

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Rm. 110
Tallahassee, FL 32399-0850

Re: Docket No. 950737-TP
Investigation into Temporary Local Number
Portability Solution to Implement Competition
in Local Exchange Telephone Markets

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of BellSouth
Telecommunications, Inc.'s Prehearing Statement, which we ask
that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to
indicate that the original was filed and return the copy to me.
Copies have been served to the parties shown on the attached
Certificate of Service.

Sincerely,

J. Phillip Carver
J. Phillip Carver

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
R. Douglas Lackey

DOCUMENT NUMBER-DATE

09709 SEP 29 95

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Temporary) Docket No. 950737-TP
Local Number Portability Solution)
to Implement Competition in Local)
Exchange Telephone Markets)
_____) Filed: September 29, 1995

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
PREHEARING STATEMENT**

BellSouth Telecommunications, Inc. ("BellSouth", "Southern Bell", or "Company"), in compliance with the Order Establishing Procedure (Order No. PSC-95-0896-PCO-TP) issued July 25, 1995, submits its Prehearing Statement.

A. Witnesses

Southern Bell proposes to call the following witness to offer direct testimony on the issues identified below:

<u>Witness</u>	<u>Issues Addressed</u>
Frank R. Kolb	Issues 3, 4, 5 and 8.

Southern Bell reserves the right to call rebuttal witnesses, witnesses to respond to Commission inquiries not addressed through direct testimony and witnesses to address issues not presently designated, which may be designated at the prehearing conference to be held on October 9, 1995, or thereafter by the Prehearing Officer.

B. EXHIBITS

Southern Bell has no exhibits at this time. However, Southern Bell reserves the right to file exhibits to any additional testimony that may be filed under the circumstances identified in Section "A" above. Southern Bell also reserves the

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right to introduce exhibits for cross examination, impeachment, or any other purpose authorized by the Florida Rules of Evidence and the Rules of this Commission.

C. STATEMENT OF BASIC POSITION

As stipulated by the parties, Remote Call Forwarding ("RCF") is the only temporary service provider number portability mechanism that can be implemented in most LECs central offices by January 1, 1996. The long run incremental cost of providing Remote Call Forwarding should be used to establish a price floor. The parties should be free to negotiate a price for this service that is above the price floor.

D. SOUTHERN BELL'S POSITION ON THE ISSUE

Issue 1: What is the definition of temporary number portability pursuant to Section 364.16(4), Florida Statutes.

On September 12, 1995, the Commission approved the following stipulation by the parties:

Stipulated Position: Temporary number portability pursuant to Section 364.16(4), Florida Statutes, is defined as an end user's ability at a given location to change service from a local exchange company (LEC) to an alternative local exchange company (ALECs) or vice versa, or between two ALECs, without changing their local telephone number. This is typically known as service provider temporary number portability.

Issue 2: What technical solutions will be available by January 1, 1996, to provide temporary number portability.

On September 12, 1995, the Commission approved the following stipulation by the parties:

Stipulated Position: The only technical solution that will be available by January 1, 1996 is remote call forwarding. However, the parties agree that the LECs will continue to negotiate with the ALECs who desire to utilize Flexible Direct Inward Dialing or any other feasible option to provide temporary number portability that may be developed in the future.

Issue 3: What are the advantages and disadvantages of each solution identified in Issue 2?

Position: The Remote Call Forwarding (RCF) temporary number portability arrangement to which the parties have stipulated has the following advantages and disadvantages.

Advantages:

1. RCF will be provisioned using existing translation routines.
2. RCF can be delivered directly from an end-office to the ALEC.
3. RCF is a known, well understood offering that is generally available.

Disadvantages:

1. Two directory numbers are required for each portable number arrangement using RCF.
2. Remote call forwarded calls would not allow for full CLASS feature transparency.
3. There is a potential call setup delay of .5 to 5 seconds.

4. Some switches may be able to handle only a limited number of call forwards at a given time.
5. Additional trunking might be required.

Issue 4: What costs are associated with providing each solution identified in Issue 2?

Position: Three major categories of long-run, incremental costs (LRC) have been identified:

1. Service Implementation
2. Central Office Equipment Software
3. Interoffice Networking

Issue 5: How should the costs identified in Issue 4 be recovered?

Position: The long run incremental costs of the RCF arrangements for temporary number portability should be recovered directly from the carriers or customers who make use of these arrangements. The prices established for the RCF arrangements should be specific to each local exchange company.

Issue 6: What is/are the most appropriate method(s) of providing temporary number portability?

On September 12, 1995, the Commission approved the following stipulation by the parties:

Stipulated Position: Remote Call Forwarding is the most appropriate method to provide temporary number portability by January 1, 1996. The parties will continue to negotiate possible future options if a party desires a different option.

Issue 7: What are the appropriate parameters, costs and standards for the method(s) identified in Issue 6?

On September 12, 1995, the Commission approved the following stipulation by the parties:

Stipulated Position: Implementation of Remote Call Forwarding as a temporary number portability mechanism can be implemented in most LEC central offices at the present time. This temporary mechanism uses existing switch and network technology. The parties agree that the LECs shall offer Remote Call Forwarding to certificated ALECs as a temporary number portability mechanism, effective January 1, 1996. ALECs shall be required to offer Remote Call Forwarding to LECs or other ALECs as a temporary number portability mechanism, effective on the date they begin to provide local exchange telephone service. All parties will work together and with the 911 coordinators to successfully integrate the relevant ALEC information into the existing 911/E911 systems. The recurring price for Remote Call Forwarding will be on a per-line per-month basis and will be uniform throughout an individual LEC's existing service territory. The price charged by an individual LEC for Remote Call Forwarding shall not be below the costs of that LEC to provide Remote Call Forwarding for purposes of providing temporary number portability. The price charged for Remote Call Forwarding offered by an ALEC will mirror the price charged by the LEC.

Issue 8: Should this docket be closed?

Position: Yes. While a permanent number portability solution should continue to be investigated and developed, a new docket should be opened for this purpose.

E. STIPULATIONS

The parties have stipulated to Issues 1, 2, 6 and 7. The substance of these stipulations is set forth above under each specific issue.

F. PENDING MOTIONS FILED BY SOUTHERN BELL

There are no currently pending motions filed by BellSouth.

G. OTHER REQUIREMENTS

BellSouth knows of no requirement set forth in the Prehearing Order with which it cannot comply.

Respectfully submitted this 29th day of September, 1995.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
DOCKET NO. 950737-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by FEDERAL EXPRESS this 29th day of September, 1995 to the following:

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