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December 11, 1995

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

Re: Docket No. 950984-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.

ROK ✓

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

AFR

ADP

OSB

[Handwritten signature]

Very truly yours,

[Handwritten signature]

Richard D. Melson

1 RDM/cc
5 Enclosures
cc: Parties of Record

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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. 950984-TP
resale involving local)
exchange companies and alternative) Filed: December 11, 1995
local exchange companies pursuant to)
Section 364.161, 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 witnesses:

<u>Witness</u>	<u>Testimony</u>	<u>Issues</u>
Don Price	Direct - 11/13 (MCI) Direct - 11/27 (MFS) Rebuttal - 12/12 (MCI)	1, 2, 4
Dr. Nina Cornell	Direct - 11/13 (MCI) Direct - 11/27 (MFS) Rebuttal - 12/12 (MCI)	1, 2, 3

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

Price Direct	DGP-1	Academic and Professional Qualifications of Don Price
Cornell Direct	NWC-1	Academic and Professional Qualifications of Dr. Nina Cornell

C. Basic Position. BellSouth should make unbundled local loops, loop transport, and loop concentration available to

MCImetro at prices equal to their total service long run incremental cost. Such unbundled facilities are necessary to facilitate the provision of local service by MCImetro to customers in areas where MCImetro does not have its own loop facilities. The unbundling of such elements is technically and economically feasible. Such elements should be priced equal to their direct economic cost (i.e. TSRLIC) in order to prevent the possibility of price squeezes.

D-F. Issues. MCImetro's positions on the issues identified in Order No. PSC-95-1516-PCO-TP are as follows:

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)?

MCImetro: BellSouth should make available to MCImetro the unbundled loops, loop concentration and loop transport that MCImetro has requested. The unbundling of such elements is technically and economically feasible. In addition, BellSouth should make available, upon request, any other element that it is technically and economically feasible to unbundle, including the additional elements requested by MFS.

Issue 2. What are the appropriate technical arrangements for the provision of such unbundled elements?

MCImetro: Unbundled loops should be provided from the customer's premises to BellSouth's central office and interconnected, at the ALEC's option, to (i) the ALEC's co-located facilities, (ii) the co-located facilities of another carrier, or (iii) loop transport facilities provided by BellSouth. Loop transport should be provided to transport traffic to or from the BellSouth central office to the point of interconnection with MCImetro, if not co-located at BellSouth's central office (e.g. to a mid-span meet or to an MCImetro entrance facility at another central office or access tandem). Loop concentration should be provided to maximize the efficiency with which traffic is delivered through transport facilities.

Issue 3. What are the appropriate financial arrangements for the provision of each such unbundled element?

MCImetro: The price of each such unbundled element should be set equal to its direct economic cost, i.e. its total service long run incremental cost.

Issue 4. What arrangements, if any, are necessary to address other operational issues?

MCImetro: BellSouth should provide order entry, repair, testing, and any other administrative systems required for the provision of unbundled facilities, on a mechanized basis.

H. Stipulations. MCImetro is not aware of any issues that have been stipulated by the petitioners in this docket, although it understands that there may be a partial stipulation between BellSouth and a number of intervenors.

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 11th day of December, 1995.

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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 11th day of December, 1995.

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