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December 8, 1995

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Via Federal Express

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

Re: Resolution of Petition(s) to establish nondiscriminatory rates, terms, and conditions for resale involving local exchange companies and alternative local exchange companies pursuant to Section 364.161, Florida Statutes

Dear Mrs. Bayo:

Enclosed is an original and 15 copies of the Rebuttal Testimony of Timothy T. Devine on Behalf of Metropolitan Fiber Systems of Florida, Inc. (Docket No.950984A-TP) and the Prehearing Statement of Metropolitan Fiber Systems, Inc. (Docket No. 950984-TP).

Also enclosed is an extra copy of each document. Please date stamp the extra copies, and return them in the enclosed self-addressed envelope.

Accompanying the filing, pursuant to Rule 25-22.028, is a computer disk containing the Prehearing Statement.

Thank you for your attention to this matter.

Chase

Sincerely,

James C. Falvey
James C. Falvey

cc: 1 All parties of record
5 *fast*

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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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Resolution of Petition(s) to establish)
nondiscriminatory rates, terms, and)
conditions for resale involving local)
exchange companies and alternative)
local exchange companies pursuant)
to Section 364.161, Florida Statutes)
)

Docket No. 950984-TP

Filed: December 11, 1995

PREHEARING STATEMENT OF
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.

Docket No. 950984-TP

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**PREHEARING STATEMENT OF
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.
Docket No. 950984-TP**

Pursuant to Rule 25-22.038(3), Florida Administrative Code, Metropolitan Fiber Systems of Florida, Inc. ("MFS-FL"), by its undersigned attorneys, hereby files this prehearing statement in the Commission's proceeding concerning the unbundling of network features, functions and capabilities, including local loops.

- (a) the name of all known witnesses that may be called by the party, and the subject matter of their testimony;**

Timothy T. Devine will testify as to the appropriate arrangements for the unbundling of BellSouth loops, ports, and other network features, functions, and capabilities (as defined by the list of issues in this proceeding), including the appropriate rates for such unbundled elements. He will also respond to proposals by other parties on these issues.

- (b) a description of all known exhibits that may be used by the party, whether they may be identified on a composite basis, and the witness sponsoring each;**

Timothy Devine, on behalf of MFS-FL, will sponsor Exhibits TTD-1 through TTD-4 attached to its Direct Testimony accompanying its separate petition for interconnection in this docket. Exhibit TTD-1 is the correspondence between BellSouth and MFS-FL in their recent interconnection negotiations. Exhibit TTD-2 is an affidavit of Timothy T. Devine. Exhibit TTD-3 is a list of processing and billing arrangements for interim number portability. Exhibit TTD-4 is a proposed stipulation of MFS-FL dated November 8, 1995.

(c) a statement of basic position in the proceeding;

BellSouth should unbundle and separately price and offer two-wire and four-wire, analog and digital loop and port elements such that MFS-FL will be able to lease and interconnect to whichever of these unbundled elements MFS-FL requires and to combine the BellSouth-provided elements with facilities and services that MFS-FL may provide itself. BellSouth should price these unbundled elements at Long Run Incremental Cost, subject to the pricing guidelines recommended in this proceeding by MFS-FL.

(d) MFS offers the following prehearing positions on the questions of law, fact and public policy identified for disposition in this docket.

1. Issue: 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: MFS-FL seeks unbundled access and interconnection to the following forms of unbundled links: (1) 2-wire analog voice grade; (2) 2-wire ISDN digital grade; and (3) 4-wire DS-1 digital grade. MFS-FL also requests that the following forms of unbundled ports be made available: (1) 2-wire analog line; (2) 2-wire ISDN digital line; (3) 2-wire analog DID trunk; (4) 4-wire DS-1 digital DID trunk; and (5) 4-wire ISDN DS-1 digital trunk. MFS-FL seeks unbundled access and interconnection to the link subelements that are resident in the

modern digital loop carrier ("DLC") systems (which provide concentration) that LECs have begun to deploy in lieu of copper pair links.

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

Position: Interconnection should be achieved via collocation arrangements MFS-FL will maintain at the wire center at which the unbundled elements are resident. MFS-FL also must be able to install DLCs at BellSouth virtual collocation sites. At MFS-FL's discretion, each link or port element should be delivered to the MFS-FL collocation arrangement over an individual 2-wire hand-off, in multiples of 24 over a digital DS-1 (or, if technically feasible, higher transmission levels) hand-off in any combination or order MFS-FL may specify, or through other technically feasible and economically comparable hand-off arrangements requested by MFS-FL (e.g., SONET STS-1 hand-off). BellSouth should unbundle and separately price and offer these elements such that MFS-FL will be able to lease and interconnect to whichever of these unbundled elements MFS-FL requires and to combine the BellSouth-provided elements with facilities and services that MFS-FL may provide itself.

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

Position: Absent mitigating circumstances, BellSouth's Long Run Incremental Costs ("LRIC") should serve as the target price and cap for unbundled loops where such loops must

be employed by ALECs to compete with BellSouth, with all of the advantages of its historical monopoly franchise. MFS-FL would also apply two additional pricing guidelines to prevent discrimination: 1) the sum of the prices of the unbundled rate elements (link, port, and cross-connect) must be no greater than the price of the bundled dial tone line; and 2) the ratio of price to LRIC for each element and for the bundled dial tone line must be the same.

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

Position: BellSouth should be required to apply all transport-based features, functions, service attributes, grades-of-service, and install, maintenance and repair intervals which apply to bundled service to unbundled links. Likewise, BellSouth should be required to apply all switch-based features, functions, service attributes, grades-of-service, and install, maintenance and repair intervals which apply to bundled service to unbundled ports.

BellSouth should permit any customer to convert its bundled service to an unbundled service and assign such service to MFS-FL, with no penalties, rollover, termination or conversion charges to MFS-FL or the customer. BellSouth should also bill all unbundled facilities purchased by MFS-FL (either directly or by previous assignment by a customer) on a single consolidated statement per wire center. BellSouth should provide MFS-FL with an appropriate on-line electronic file transfer arrangement by which MFS-FL may place, verify

and receive confirmation on orders for unbundled elements, and issue and track trouble-ticket and repair requests associated with unbundled elements.

(g) a statement of issues that have been stipulated to by the parties;

To MFS-FL's knowledge, no issues have been stipulated to by the parties.

(h) a statement of all pending motions or other matters the party seeks action upon;

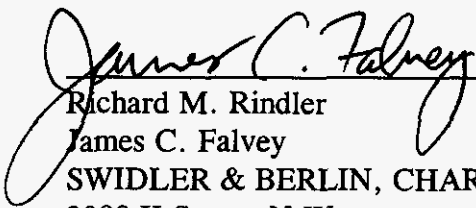
None.

(i) a statement as to any requirement set forth in this order that cannot be complied with, and the reasons therefor.

None.

Respectfully submitted,

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Dated: December 8, 1995

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of December, 1995, a copy of the foregoing document was served, via federal express, upon the following parties:

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