

10 50  
u

LAW OFFICES  
MESSER, CAPARELLO, MADSEN, GOLDMAN & METZ  
A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701  
POST OFFICE BOX 1876  
TALLAHASSEE, FLORIDA 32302-1876  
TELEPHONE: (904) 222-0720  
TELECOPIERS: (904) 224-4359; (904) 425-1942

ORIGINAL  
FILE COPY

February 20, 1996

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

BY HAND DELIVERY

Re: Docket No. 950985-TP

Dear Ms. Bayo:

Enclosed for filing on behalf of McCaw Communications of Florida, Inc. is the original and 15 copies of a Prehearing Statement in the above-referenced docket. Also enclosed is a 3 1/2" diskette in WordPerfect 6.1 format with the document on it called "MCCAW.PHG."

Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Chen
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1 NHH/amb
- LIN 5 Enclosures
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- VAS \_\_\_\_\_
- OTH \_\_\_\_\_

Your attention to this filing is appreciated.

Sincerely,

*Norman H. Horton, Jr.*  
Norman H. Horton, Jr.

cc: William H. Higgins, Esq.  
Parties of Record

SEARCHED  
SERIALIZED  
INDEXED  
FILED  
FEB 20 1996  
FBI - TALLAHASSEE

DOCUMENT NUMBER-DATE  
02010 FEB 20 96  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petitions)  
to Establish Nondiscriminatory)  
Rates, Terms, and Conditions )  
for Interconnection Involving )  
Local Exchange Companies and )  
Alternative Local Exchange )  
Companies )  
\_\_\_\_\_)

Docket No. 950985-TP  
Filed: February 20, 1996

PREHEARING STATEMENT OF  
McCaw Communications of Florida, Inc.

McCaw Communications of Florida , Inc. on behalf of itself and its Florida regional affiliates ("McCaw"), pursuant to the requirements of Order No. PSC-96-0136-PCO-TP, respectfully submits its prehearing statement.

APPEARANCES

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

A. WITNESSES

McCaw does not intend to call any witnesses, but reserves the right to call witnesses, if necessary, as may be required by later filed testimony, completion of discovery, or new issues identified at the prehearing conference.

DOCUMENT NUMBER-DATE

02010 FEB 20 96

FPSC-RECORDS/REPORTING 647

## B. EXHIBITS

McCaw does not intend to present any exhibits, but reserves the right to introduce exhibits, if necessary, as may be required by cross examination, later filed testimony, completion of discovery, or new issues identified at the prehearing conference.

## C. BASIC POSITION

For local competition to develop, the competing local carriers must interconnect pursuant to rates, terms, and conditions that meet the technical and economic needs of each party. To the extent such rates, terms, and conditions cannot be negotiated, this Commission must establish nondiscriminatory rates, terms and conditions.

## D. ISSUES AND POSITIONS

**Issue 1: What are the appropriate rate structures, interconnection rates, or other compensation arrangements for the exchange of local and toll traffic between the respective ALECs and United/Centel and GTEFL?**

McCAW'S POSITION: A bill and keep approach appears to be the most appropriate interim approach, and it may be a long term viable solution. If a minute of use charge is to be established, it should be set at cost without any further mark up or contribution.

**Issue 2:** If the Commission sets rates, terms, and conditions for interconnection between the respective ALECs and United/Centel and GTEFL, should United/Centel tariff the interconnection rate(s) or other arrangements?

McCAW'S POSITION: Yes.

**Issue 3:** What are the appropriate technical and financial arrangements which should govern interconnection between the respective ALECs and United/Centel and GTEFL for the delivery of calls originated and/or terminated from carriers not directly connected to the ALEC's network?

McCAW'S POSITION: No position at this time.

**Issue 4:** What are the appropriate technical and financial requirements for the exchange of intraLATA 800 traffic which originates from the respective ALEC's customer and terminates to an 800 number served by or through United/Centel and GTEFL?

McCAW'S POSITION: No position at this time.

**Issue 5a:** What are the appropriate technical arrangements for the interconnection of the respective ALECs' networks to United/Centel and GTEFL's 911 provisioning network such that the respective ALEC's customers are ensured the same level of 911 service as they would receive as a customer of United/Centel or GTEFL?

McCAW'S POSITION: No position at this time.

**Issue 5b:** What procedures should be in place for the timely exchange and updating of the respective ALEC's customer information for inclusion in appropriate E911 databases?

McCAW'S POSITION: No position at this time.

**Issue 6: What are the appropriate technical and financial requirements for operator handled traffic flowing between the respective ALECs and United/Centel and GTEFL including busy line verification and emergency interrupt services?**

McCAW'S POSITION: No position at this time.

**Issue 7: What are the appropriate arrangements for the provision of directory assistance services and data between the respective ALECs and United/Centel and GTEFL?**

McCAW'S POSITION: No position at this time.

**Issue 8: Under what terms and conditions should United/Centel and GTEFL be required to list the respective ALEC's customers in its white and yellow pages directories and to publish and distribute these directories to the respective ALEC's customers?**

McCAW'S POSITION: No position at this time.

**Issue 9: What are the appropriate arrangements for the provision of billing and collection services between the respective ALECs and United/Centel and GTEFL, including billing and clearing credit card, collect, third party and audiotext calls?**

McCAW'S POSITION: No position at this time.

**Issue 10: What arrangements are necessary to ensure the provision of CLASS/LASS services between the ALECs and United/Centel and GTEFL's networks?**

McCAW'S POSITION: No position at this time.

**Issue 11: What are the appropriate arrangements for physical interconnection between the respective ALECs and United/Centel and GTEFL, including trunking and signaling arrangements?**

McCAW'S POSITION: No position at this time.

**Issue 12:** To the extent not addressed in the number portability docket, Docket No. 950737-TP, what are the appropriate financial and operational arrangements for interexchange calls terminated to a number that has been "ported" to the respective ALECs?

McCAW'S POSITION: No position at this time.

**Issue 13:** What arrangements, if any, are necessary to address other operational issues?

McCAW'S POSITION: No position at this time.

**Issue 14:** What arrangements, if any, are appropriate for the assignment of NXX codes to the ALECs?

McCAW'S POSITION: Such assignments should be on a nondiscriminatory basis, with each carrier recovering its own NXX establishment charges.

#### **E. STIPULATIONS**

There have not been any issues stipulated at this time.

#### **F. PENDING MOTIONS**

McCaw does not have any pending motions.


**G. COMPLIANCE WITH OTHER REQUIREMENTS**

McCaw is unaware of any other requirements of the prehearing order that cannot be complied with.

Dated this 20th day of February, 1996.

Respectfully submitted,  
MESSER, CAPARELLO, MADSEN, GOLDMAN &  
METZ, P.A.

Post Office Box 1876  
Tallahassee, FL 32302-1876  
(904) 222-0720



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

Attorneys for McCaw Communications  
of Florida, Inc. and its Florida  
regional affiliates

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Prehearing Statement of McCaw Communications of Florida, Inc. in Docket No. 950985-TP has been furnished by Hand Delivery (\*) and/or U. S. Mail on this 20th day of February, 1996 to the following parties of record:

Robert Elias, Esq.\*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Jack Shreve  
Office of the Public Counsel  
111 W. Madison St., Room 812  
Tallahassee, FL 32399-1400

Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 S. Monroe St., Suite 400  
Tallahassee, FL 32301

Beverly Y. Menard  
c/o Richard Fletcher  
GTE Florida, Inc. Fo  
106 E. College Avenue, Suite 1440  
Tallahassee, FL 32301-7704

F. Ben Poag  
Sprint/United Telephone  
Company of Florida  
315 S. Calhoun St. Suite 740  
Tallahassee, FL 32301

Laurie Maffett  
Frontier Communications of the South,  
Inc.  
4th Floor  
180 S. Clinton Ave.  
Rochester, NY 14646-0400

Mr. Richard Brashear  
ALLTEL Florida, Inc.  
P.O. Box 550  
Live Oak, FL 32060-0550

David B. Erwin  
Young Van Assenderp et al.  
225 S. Adams Street, Suite 200  
Tallahassee, FL 32301

Jodie Donovan  
Teleport Communciations Group  
2 Lafayette Place  
Suite 400  
1133 Twenty-First St., NW  
Washington, DC 20036

Kenneth A. Hoffman  
William Be. Willingham  
Rutledge, Ecenia, Underwood,  
and Hoffman  
215 S. Monroe St., Suite 420  
Tallahassee, FL 32301

A. D. Lanier  
Gulf Telephone  
P.O. Box 1120  
Perry, FL 32347

Dan Gregory  
Quincy Telephone Company  
P.O. Box 189  
Quincy, FL 32363-0189

John McGlew  
Northeast Florida Telephone Co.  
P.O. Box 485  
Macclenny, FL 32063-0485

Ferrin Seay  
Floral Telephone Company  
P.O. Box 186  
Floral, AL 36442

Robert M. Post  
Indiantown Telephone System, Inc.  
P.O. Box 277  
Indiantown, FL 34956-0277

Lynn B. Hall  
Vista-United Telecommunications  
P.O. Box 10180  
Lake Buena Vista, FL 32830-0180



John Vaughan  
St. Joseph Telephone & Telegraph Co.  
P.O. Box 220  
Port St. Joe, FL 32456

Michael W. Tye, Esq.  
Senior Attorney  
AT&T  
101 N. Monroe St., Ste. 700  
Tallahassee, FL 32301

Robin Dunson, Esq.  
AT&T  
Promenade I, Room 4038  
1200 Peachtree St., NE  
Atlanta, GA 30309

Anthony P. Gillman  
Kimberly Caswell  
GTE Florida, Inc.  
c/o Richard M. Fletcher  
106 E. College Ave., Suite 1440  
Tallahassee, FL 32301

Richard D. Melson  
Hopping Green Sams & Smith  
123 S. Calhoun St.  
Tallahassee, FL 32301

Michael J. Henry  
MCI Telecommunications Corp.  
780 Johnson Ferry Road., Suite 700  
Atlanta, GA 30342

Laura L. Wilson, Esq.  
Florida Cable Telecommunications  
Association  
310 N. Monroe Street  
Tallahassee, FL 32301

Sue E. Weiske  
Senior Counsel  
Time Warner Communications  
160 Inverness Drive West  
Englewood, CO 80112

Richard Rindler  
James C. Falvey  
Swidler & Berlin, Chartered  
Suite 300  
3000 K Street, NW  
Washington, DC 20007

Timothy Devine  
MFS Communications Co., Inc.  
Six Concourse Parkway, Suite 2100  
Atlanta, GA 30328

Patrick K. Wiggins  
Wiggins & Villacorta  
P.O. Drawer 1657  
Tallahassee, FL 32302

Peter M. Dunbar, Esq.  
Robert S. Cohen, Esq.  
Pennington, Culpepper, Moore,  
Wilkinson, Dunbar and Dunlap, P.A.  
P.O. Box 10095  
Tallahassee, FL 32302

Ms. Jill Butler  
Florida Regulatory Director  
Time Warner Communications  
2773 Red Maple Ridge  
Tallahassee, FL 32301

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs,  
Odom & Ervin  
Post Office Drawer 1170  
Tallahassee, FL 32302

Benjamin Fincher, Esq.  
Sprint Communications Co.  
Limited Partnership  
3065 Cumberland Circle  
Atlanta, GA 30339

By:   
Norman H. Horton, Jr.