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November 14, 1995

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BY HAND DELIVERY

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

Re: Docket No. 950985-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 petition and supporting direct testimony of Don Price and Nina Cornell.

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

Very truly yours,

Richard D. Melson

Richard D. Melson

RDM/cc
Enclosures
cc: Parties of Record

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<i>Cornell</i> testimony	<i>Price</i> testimony
DOCUMENT NUMBER-DATE	DOCUMENT NUMBER-DATE
11296 NOV 14 88	11295 NOV 14 88
FPSC-RECORDS/REPORTING	FPSC-RECORDS/REPORTING

Petition
DOCUMENT NUMBER-DATE
11294 NOV 14 88
FPSC-RECORDS/REPORTING

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 14th day of November, 1995.

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Attorney

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition(s) to)
establish nondiscriminatory rates,)
terms and conditions for interconnection) Docket No. 950985-TP
involving local exchange companies)
and alternative local exchange companies) Filed: Nov. 14, 1995
pursuant to section 364.162, Florida)
Statutes)
_____)

PETITION OF MCIMETRO

MCI Metro Access Transmission Services, Inc. (MCImetro),
pursuant to Rule 25-22.036, F.A.C., Section 364.162, F.S., and
the Order Establishing Procedure in this docket, hereby petitions
the Commission to hold a proceeding under section 120.57(1), F.S.
to establish nondiscriminatory rates, terms and conditions for
local interconnection between MCImetro and BellSouth
Telecommunications, Inc. (BellSouth). As grounds therefor,
MCImetro states:

- 1. The complete name and address of Petitioner is:

MCI Metro Access Transmission Services, Inc.
2250 Lakeside Boulevard
Richardson, TX 75082

- 2. All notices, pleadings, orders and other materials in
this docket should be provided to:

Michael J. Henry
MCI Telecommunications Corp.
Suite 700
780 Johnson Ferry Road
Atlanta, GA 30346

Richard D. Melson
Hopping Green Sams & Smith
123 South Calhoun Street
P.O. Box 6526
Tallahassee, FL 32314

BACKGROUND

- 3. MCImetro filed a notice of intent to provide
alternative local exchange telecommunications services with the

Commission on June 30, 1995. By Order No. PSC-95-1256-FOF-TX, issued October 11, 1995, the Commission acknowledged the filing and held that MCImetro will be authorized to provide alternative local exchange service beginning January 1, 1996.

4. On or about July 18, 1995, MCImetro initiated negotiations with BellSouth regarding the arrangements for local interconnection required for MCImetro to provide local exchange telecommunications service within BellSouth's territory and regarding the unbundled network features, functions and capabilities that MCImetro desires to purchase from BellSouth. Since that date, MCImetro has held numerous meetings with BellSouth representatives, in person and by telephone, in an effort to negotiate satisfactory arrangements for interconnection and unbundling.

5. As of this date, MCImetro has not reached formal agreement with BellSouth on any issues, although there are some issues on which the parties appear to be in general agreement and other issues that are still under discussion.

6. The two primary issues on which MCImetro and BellSouth have failed to reach agreement are the financial arrangements for local interconnection and the price, terms and conditions for the purchase of unbundled local loops. Under the provisions of Section 364.162, it appears that separate petitions are required for local interconnection and unbundling/resale issues. The petition in this docket therefore addresses the financial and other local interconnection issues. MCImetro's companion

petition filed today in Docket No. 950984-TP addresses the issues regarding the unbundling and resale of local loops.

MCIMETRO'S SUBSTANTIAL INTERESTS

7. Economically viable local interconnection is an essential prerequisite to MCImetro's ability to enter and operate in the local telecommunications market in Florida. MCImetro's substantial interests are therefore affected by the financial and other arrangements that are established for local interconnection and for the various ancillary functions and services required as part of a comprehensive interconnection arrangement.

DISPUTED ISSUES OF FACT AND ULTIMATE FACTS ALLEGED

8. The disputed issues of fact in this proceeding are what financial arrangements and other terms and conditions should be established for local interconnection between MCImetro and BellSouth and for the various ancillary functions and services that are required as part of a comprehensive interconnection arrangement. The following is a list of the arrangements that MCImetro believes are required and a summary of its position as to the appropriate terms and conditions for such arrangements. Where indicated, MCImetro believes that BellSouth is in general agreement, although no formal agreement has been concluded. Unless and until a formal agreement is reached on these issues, or BellSouth stipulates to an acceptable position through the normal prehearing process, MCImetro believes that these must be treated as issues that will require resolution by the Commission.

a. Issue. What are the appropriate rate structure, interconnection rates, or other arrangements for the exchange of local exchange traffic between MCImetro and BellSouth?

Facts Alleged. The appropriate arrangement is mutual traffic exchange in which the parties have the same co-carrier status that exists today between BellSouth and the other LECS and in which MCImetro and BellSouth compensate each other "in kind" by terminating local exchange traffic from the other party without cash compensation.

b. Issue. What are the appropriate rate structure, interconnection rates, or other arrangements for the exchange of toll traffic between MCImetro and BellSouth?

Facts Alleged. The appropriate arrangement is the payment of terminating switched access charges by the carrier originating the traffic to the carrier terminating the traffic. MCImetro should be permitted to establish switched access charge rates by tariff or price list using a rate structure of its choosing, subject only to the limitation that MCImetro's total price for terminating an interexchange call does not exceed the price that would be charged by BellSouth for terminating an interexchange call.

c. Issue. What are the appropriate arrangements for physical interconnection between MCImetro and BellSouth?

Facts Alleged. MCImetro should be permitted to designate one point of interconnection (POI) in each local calling area. MCImetro should have the option to establish the

POI via collocation, mid-span meet, or an entrance arrangement. Each carrier should be responsible for providing its own facilities to route calls to and from the POI. If a mid-span meet or entrance arrangement is used, no collocation charges should apply to facilities provided to the POI.

d. Issue. What are the appropriate arrangements for the delivery of calls originated by MCImetro to and/or terminated to MCImetro from other carriers (IXCs, ALECs, other LECs, wireless carriers) that are not directly connected to MCImetro?

Facts Alleged. For local traffic originated to or terminated from other carriers through BellSouth's network, BellSouth should be required to provide the transit function to MCImetro at a price equal to its direct economic cost (i.e. TSLRIC). For toll traffic originated to or terminated from other carriers through BellSouth's network, BellSouth should be required to provide the transit function to MCImetro on the same basis that this function is provided to other LECs.

e. Issue. What are the appropriate arrangements for trunking between MCImetro and BellSouth? [The parties may be near agreement on this issue.]

Facts Alleged. MCImetro should have the option to use either one-way or two-way trunks. The carrier receiving the traffic should be entitled to designate how traffic is segregated (e.g. local vs. toll). Trunking and signalling that complies with industry standards should be provided for directory

assistance, local, interLATA toll, intraLATA toll, operator services, and 911/E911.

f. Issue. What are the appropriate signalling arrangements between MCImetro and BellSouth? [The parties appear to be in agreement on this issue.]

Facts Alleged. BellSouth should provide MCImetro with common channel signalling on all trunk types that support CCS7 signalling. BellSouth should provide MCImetro with service for 911 trunks and operator service which complies with the appropriate industry standards.

g. Issue. What are the appropriate arrangements for payment of access charges on interexchange calls terminated to a number that has been "ported" to MCImetro.

Facts Alleged. Since MCImetro is the carrier terminating the call, it is entitled to the terminating access charges. Any such charges collected by BellSouth with respect to such a call should be remitted to MCI.

h. Issue. What are the appropriate order processing arrangements between MCImetro and BellSouth? [This item is under discussion with BellSouth.]

Facts Alleged. BellSouth must develop and offer mechanized intercompany procedures to support the ordering by MCImetro of unbundled loops, interoffice facilities (POI arrangements and trunks), interim number portability mechanisms, customer listing databases, and any other service or function

necessary for the interoperability of BellSouth's and MCI metro's networks.

i. Issue. What are the appropriate arrangements for the assignment of central office (NXX) codes to MCI metro? [The parties appear to be in agreement on this issue.]

Facts Alleged. Until the NXX code administration function is moved to a neutral third party administrator, BellSouth should be required to provide nondiscriminatory NXX assignments to MCI metro on the same basis that such assignments are made to other LECs, including BellSouth.

j. Issue. What are the appropriate arrangements for the provision of 911 service? [The parties appear to be in agreement on this issue.]

Facts Alleged. BellSouth should be required to make trunking and network arrangements available so that MCI metro can route 911 calls through the existing 911 network. BellSouth should also be required to provide MCI metro with access to the "master street address guide" that is used to ensure that address information is in the correct format for inclusion in the 911 Automatic Location Identification (ALI) database. BellSouth should be required to provide MCI metro with the ability to make mechanized entries into the ALI database(s).

k. Issue. What are the appropriate arrangements for the support of repair service? [This item is under discussion with BellSouth.]

Facts Alleged. BellSouth must develop mechanized intercompany procedures to support repair services, including referral of trouble tickets, trouble isolation in interconnection facilities, and trouble isolation on unbundled facilities.

1. Issue. What are the appropriate arrangements for the support of directory assistance by MCImetro? [The parties may be near agreement on this issue.]

Facts Alleged. BellSouth should be required to offer three options for directory assistance, including resale, database access, and database purchase.

m. Issue. What are the appropriate arrangements for the provision of white pages and DA listings? [The parties may be near agreement on this issue.]

Facts Alleged. BellSouth should be required to include MCImetro's customers in its white pages and DA listings databases at no charge. In exchange, MCImetro would provide its customer listings to BellSouth at no charge. BellSouth should distribute the complete white page and yellow page directories to MCImetro's customers at no charge. BellSouth should include information on MCImetro's services in the "informational" section of the white pages directory.

n. Issue. What are the appropriate arrangements for busy line verification and operator interrupt? [This item is under discussion with BellSouth.]

Facts Alleged. BellSouth must institute the procedures necessary to allow MCImetro operators to perform busy line

verification and operator interrupt for customers on BellSouth's network.

o. Issue. What are the appropriate arrangements for the provision of billing and collection services? [This item is under discussion with BellSouth.]

Facts Alleged. BellSouth must provide MCImetro with access to the line information database in order to validate calls placed to BellSouth customers using third-party billed, collect, and credit card calls. BellSouth should be required to treat MCImetro like any other LEC in the billing and clearing of fund transfers for credit card and collect calls when the end user billed for the call is BellSouth's customer.

BASIS FOR RELIEF

9. MCImetro is entitled to relief pursuant to Sections 364.162 and 120.57, Florida Statutes, and Rule 25-22.036, Florida Administrative Code. Section 364.162 provides that any party who had an application on file with the Commission on July 1, 1995, to become an ALEC shall have until August 31, 1995 to negotiate mutually acceptable prices, terms and conditions for interconnection. Failing agreement, that section gives either party the right to petition the Commission to establish nondiscriminatory rates, terms and conditions of interconnection and requires the Commission, after hearing, to decide the issues within 120 days after the date of the petition.

WHEREFORE, MCImetro petitions the Commission to:

(a) Schedule a formal hearing pursuant to Section 120.57(1) on this petition; and

(b) After hearing, establish nondiscriminatory rates, terms and conditions for interconnection and for the various ancillary functions and services between MCI metro and BellSouth as set forth in the body of this petition.

RESPECTFULLY SUBMITTED this 14th day of November, 1995.

HOPPING GREEN SAMS & SMITH, P.A.

By: Richard D. Melson
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PROPOSED LIST OF ISSUES FOR THIS PROCEEDING

1. What are the appropriate rate structure, interconnection rates, or other arrangements for the exchange of local exchange traffic between MCImetro and BellSouth?
2. What are the appropriate rate structure, interconnection rates, or other arrangements for the exchange of toll traffic between MCImetro and BellSouth?
3. What are the appropriate arrangements for physical interconnection between MCImetro and BellSouth?
4. What are the appropriate arrangements for the delivery of calls originated by MCImetro to and/or terminated to MCImetro from other carriers (IXCs, ALECs, other LECs, wireless carriers) that are not directly connected to MCImetro?
5. What are the appropriate arrangements for trunking between MCImetro and BellSouth?
6. What are the appropriate signalling arrangements between MCImetro and BellSouth?
7. What are the appropriate arrangements for payment of access charges on interexchange calls terminated to a number that has been "ported" to MCImetro.
8. What are the appropriate order processing arrangements between MCImetro and BellSouth?
9. What are the appropriate arrangements for the assignment of central office (NXX) codes to MCImetro?
10. What are the appropriate arrangements for the provision of 911 service?
11. What are the appropriate arrangements for the support of repair service?
12. What are the appropriate arrangements for the support of directory assistance by MCImetro?
13. What are the appropriate arrangements for the provision of white pages and DA listings?
14. What are the appropriate arrangements for busy line verification and operator interrupt?

15. What are the appropriate arrangements for the provision of billing and collection services by BellSouth to MCImetro?

PROVISIONS THAT HAVE BEEN AGREED TO

MCImetro and BellSouth have not reached a formal agreement on any of the issues identified above. The following are three categories of issues for which MCImetro believes there is a reasonable possibility of reaching agreement.

- A. MCImetro and BellSouth may be in general agreement on Issue 6 (signalling arrangements), Issue 9 (assignment of NXX codes), and Issue 10 (provision of 911 service).
- B. MCImetro and BellSouth may be near agreement on Issue 5 (trunking), Issue 12 (support of directory assistance), and Issue 13 (white pages and DA listings).
- C. The parties are engaged in technical discussions on Issue 8 (order processing), Issue 11 (repair service), Issue 14 (busy line verification/operator interrupt) and Issue 15 (billing and collection).

Unless and until a formal written agreement is reached on these issues, or BellSouth has stipulated to positions on these issues that are acceptable to MCImetro, all of these are issues that may require resolution by the Commission in this proceeding.

ISSUES THAT ARE UNRESOLVED

The following issues are unresolved and the parties do not appear to be making significant headway toward their resolution:

- Issue 1 financial arrangements for termination of local traffic
- Issue 2 financial arrangements for termination of toll traffic
- Issue 3 arrangements for physical interconnection
- Issue 4 arrangements for origination/termination of traffic to/from other carriers with whom MCImetro does not directly connect
- Issue 7 arrangements for payment of access charges on terminating calls to ported numbers