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February 20, 1996

IN REPLY REFER TO:
Tallahassee

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

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Re: Resolution of Petition to Establish Non
Discriminatory Rates, Terms, and Conditions
for Interconnection Involving Local Exchange
Companies and Alternative Local Exchange
Companies pursuant to Section 364.162,
Florida Statutes - Docket No. 950985-TP

Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the
original and fifteen (15) copies of United/Centel's Prehearing
Statement. A copy of this document is included in WP 5.1 format on
the accompanying disk.

Please acknowledge receipt and filing of the above by stamping
the duplicate copy of this letter and returning the same to this
writer.

Thank you for your assistance in this matter.

Sincerely,

[Handwritten signature of J. Jeffrey Wahlen]

J. Jeffrey Wahlen

- ACK [checked]
AFA
APP
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cc: All parties of record
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition to) DOCKET NO. 950985-TP
Establish Non Discriminatory Rates,) Filed: February 20, 1996
Terms, and Conditions for Inter-)
connection Involving Local Exchange))
Companies and Alternative Local)
Exchange Companies pursuant to)
Section 364.162, Florida Statutes)
_____)

UNITED/CENTEL'S
JOINT PREHEARING STATEMENT

Pursuant to Order No. PSC-96-0136-PCO-TP, Central Telephone Company of Florida ("Sprint/Centel") and United Telephone Company of Florida ("Sprint/United") (collectively the "Companies"), through their undersigned counsel, file their Joint Prehearing Statement.

A. **WITNESS:** The companies will offer the prepared direct testimony and rebuttal testimony of F. Ben Poag, and the rebuttal testimony of Gene E. Michaelson.

B. **EXHIBITS:** The Companies will offer the Composite Exhibit of Gene E. Michaelson (GEM-1), consisting of three documents.

C. **BASIC POSITION:** There are two methods of local interconnection which will appropriately meet the requirements for local interconnection. One is a flat rate port charge at the DS1 level, the other is a per minute of use charge. The rates for both methods should maintain the existing relationship to access charges

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to minimize arbitrage. Additionally, maintaining the relationship to access charges mitigates reinventing the wheel to determine new tariffs, processes, rate elements, terms and conditions.

The Companies' preference is the flat rate port charge as it will be less costly to implement, in terms of measurement costs, but still meets the statutory obligations to establish an interconnection charge which covers costs.

D-G. 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 ALECs and Sprint United/Centel?

POSITION: Florida Statute 364.162(4) states "In setting the local interconnection charge, the Commission shall determine that the charge is sufficient to cover the cost of furnishing interconnection." Two methods are available to meet the statutory requirement, a port charge or a per minute of use charge. Compensation would be reciprocal under either method. The flat rate structure of the port charge has several advantages over the minute of use method of compensation. The port charge method meets the statutory requirements, provides an administratively efficient equitable method and reflects the manner in which the actual interconnection is provisioned; i.e., DS1 increments.

It is Sprint-United/Centel's position that intraLATA toll compensation should continue to use the existing toll compensation

arrangements that exists today between LECs, but that some modification to the plan will be necessary to be consistent with the intrastate local transport restructure.

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

POSITION: Yes, Sprint United/Centel would tariff its interconnection arrangements.

ISSUE 3: What are the appropriate technical and financial arrangements which should govern interconnection between the ALECs and Sprint United/Centel for the delivery of calls originated and/or terminated from carriers not directly connected to the ALECs' networks?

POSITION: Sprint proposes that this type of intermediary function can be provided based on tandem switching and transport rate elements similar to the local transport rate elements already approved by this Commission. The tandem switching rate element should be based on full recovery of the access tandem investment rather than the 20% recovery used for the interLATA access tariff tandem switching rate element. The difference being that in the access tariff, the other 80% of the investment was recovered in the RIC. However, since the proposed local interconnection charges exclude the RIC and CCL rate elements, full recovery should be included in the tandem switching rate applicable to local interconnection.

ISSUE 4: What are the appropriate technical and financial requirements for the exchange of intraLATA 800 traffic which originates from the ALECs' customer and terminates to an 800 number served by or through Sprint United/Centel?

POSITION: The ALEC, after completing an 800 query function, would route the calls to Spring United/Centel via interconnection facilities. The ALEC would record the call and forward the record to a clearinghouse which forwards the record to Spring United/Centel for billing. Spring United/Centel would compensate the ALEC for originating access charges. A reciprocal arrangement should also be applicable for Sprint United/Centel originated calls terminating to the ALEC. Sprint United/Centel will compensate ALECs for the origination of 800 traffic terminated to the Sprint companies pursuant to tariffed originating switched access charges, excluding the database query. The ALECs will need to provide the appropriate records necessary for Sprint United/Centel to bill its customers and compensate the ALECs. The records should be provided in the standard industry format (EMR). Sprint United/Centel will compensate the ALECs based on its tariffed rates for this function. At such time as an ALEC elects to provide 800 services, the ALEC will reciprocate this arrangement.

ISSUE 5a: What are the appropriate technical arrangements for the interconnection of the ALECs' networks to Sprint United/Centel's 911 provisioning networks such that the ALECs' customers are ensured the same level of 911 service as they would receive as a customer of Sprint United/Centel?

POSITION: For basic 911 service, Sprint United/Centel will share emergency number data with the ALECs for those municipalities that subscribe to basic 911 services. For Enhanced 911 (E911) service,

Sprint United/Centel will offer a daily update to the companies' data bases of ALECs' emergency information when provided to Sprint United/Centel. Sprint United/Centel will work with the ALECs to define record layouts, media requirements and procedures for the process. The ALECs will be provided access to Sprint United/Centel E911 tandem switches for routing their customers' E911 calls to the various emergency agencies.

To the extent that administering and providing E911 access facilities to ALECs increases Sprint United/Centel's costs, such costs should be recovered from the ALECs. However, those costs should only be recovered from ALECs to the same extent that they are recovered from other LECs for the same service.

ISSUE 5b: What procedures should be in place for the timely exchange and updating of the ALECs' customer information for inclusion in appropriate E911 databases?

POSITION: Daily updates would be required from ALECs in order to maintain the accuracy of the 911 data-base information. Sprint United/Centel will work with the ALECs to define the requirements for records, and other database related procedures.

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

POSITION: Sprint United/Centel and the ALECs shall mutually provide each other busy line verification and emergency interrupt services

pursuant to tariff. It will be necessary to establish dedicated trunk groups between each company's operator services system.

ISSUE 7: What are the appropriate arrangements for the provision of directory assistance services and data between the ALECs and Sprint United/Centel?

POSITION: Sprint United/Centel will include ALECs' customer information in its directory assistance (DA) database and provide DA operator services on the same terms and conditions as those services are provided to other LECs and IXC's. Sprint United/Centel will work cooperatively with the ALECs on issues concerning timeliness, format and listing information content.

ISSUE 8: Under what terms and conditions should Sprint United/Centel be required to list the ALECs' customers in its white and yellow pages directories and to publish and distribute these directories to the ALECs' customers?

POSITION: The cost for directories should be shared on a prorata basis by Sprint United/Centel and the ALECs for the basic directory printing and distribution services. In addition, Sprint United/Centel pays its affiliated directory company for any informational pages Sprint United/Centel requires over a base number of pages. If the ALECs wish to provide customer information pages to Sprint United/Centel for inclusion in the directory, the ALECs should pay whatever it would cost Sprint United/Centel to have such pages included. Sprint United/Centel should not be required to incur additional costs on behalf of ALECs and be expected to absorb those costs. While it is in Sprint

United/Centel's best interest to offer the best directory products possible, it is equally as valuable and important to the ALECs.

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

POSITION: Appropriate interconnection facilities to the Access Tandem TOPS Center will be required. Sprint United/Centel will work with the ALECs to define the interconnection activities required. Billing would be handled via tariff or contract rates on a mutual compensation basis.

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

POSITION: Sprint United/Centel will provide Common Channel Signaling (CCS) on a reciprocal basis, where available in conjunction with all traffic in order to enable full interoperability of CLASS features and functions.

ISSUE 11: What are the appropriate arrangements for physical interconnection between the ALECs and Sprint United/Centel, including trunking and signalling arrangements?

POSITION: Sprint United/Centel is willing to review engineering requirements on a quarterly basis and establish forecasts for trunk utilization. New trunk groups will be implemented as dictated by engineering requirements for both Sprint United/Centel and the ALEC.

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 ALECs?

POSITION: For terminating toll traffic ported to the ALEC, Sprint United/Centel will bill the IXC tandem switching, the residual interconnection charge and a portion of the transport, and the ALEC should bill the IXC local switching, the carrier common line and a portion of the transport. If Sprint United/Centel is unable to provide the necessary access records to permit the ALECs to bill the IXCs directly for terminating access to ported numbers, then Sprint United/Centel will work cooperatively to develop a surrogate method to approximate the access minutes and revenues, and develop a settlement process based on the above distribution. If intraLATA calls are delivered to the other party via a ported number, the originating party will pay the terminating party.

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

POSITION: Operational issues, such as repair service arrangements, are most appropriately resolved through the negotiation process. Operational issues will be different for each ALEC and can best be addressed as the parties develop more specific operational details and procedures and actual points of interconnection. Should issues arise between the parties that cannot be resolved, the existing complaint procedures are the appropriate means for resolution. Sprint United/Centel will address them in this manner.

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

POSITION: Numbering policy must be broadly developed and administered in a competitively neutral manner. The LEC must not be able to control the administration and assignment of numbering resources. NXX assignments must be handled in a neutral and nondiscriminatory manner.

Issue 15 (legal): To what extent are the non-petitioning parties that actively participate in this proceeding bound by the Commission's decision in this docket as it relates to Sprint-United/Centel?

POSITION: All entities that participate in the proceedings between the petitioners and Sprint-United/Centel should be bound by the Commission's decision, i.e., If and when they seek to interconnect with the Sprint-United/Centel, they should be required to pay and abide by the rates, terms and conditions set in this proceeding for Sprint-United/Centel¹.

H. STIPULATIONS: The Companies are not aware of any pending stipulations at this time.

I. PENDING MOTIONS: Except for United Telephone Company of Florida and Central Telephone Company of Florida's Motion on Issues and Parties, which was filed contemporaneously with this prehearing statement, the Companies are not aware of any pending motions at

¹This is a new issue and is being raised in this prehearing statement consistent with United Telephone Company of Florida and Central Telephone Company of Florida's Motion on Issues and Parties, filed contemporaneous with this prehearing statement.

this time. The Companies request that the Prehearing Officer hear and rule on this motion at the Prehearing Conference.

J. COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE: The Companies do not know of any requirement of the Order on Prehearing Procedure with which they cannot comply.

DATED this 20th day of February, 1996.



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ATTORNEYS FOR CENTRAL TELEPHONE
COMPANY OF FLORIDA AND UNITED
TELEPHONE COMPANY OF FLORIDA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) or overnight express (**) this 20th day of February, 1996, to the following:

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