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February 19, 1996

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 interconnection involving local exchange companies and alternative local exchange companies pursuant to Section 364.162, Florida Statutes (Docket No. 950985D-TP) (Petition of MFS-FL for Interconnection with United/Centel)

Dear Mrs. Bayo:

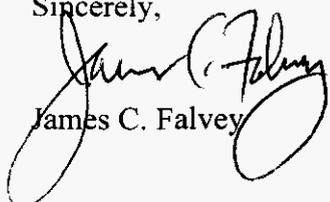
Enclosed for filing are an original and fifteen (15) copies of the Rebuttal Testimony of Timothy T. Devine and Prehearing Statement of Metropolitan Fiber Systems of Florida, Inc. in the above-captioned docket.

ACK A copy of the Prehearing Statement on diskette is enclosed pursuant to Rule 25-22-
AFA 028(1). Also enclosed are extra copies of the documents. Please date stamp the extra copies and
APP return them in the enclosed self-addressed envelope.

CAF Thank you for your attention to this matter.

CMU Chase

Sincerely,



James C. Falvey

CTR

EAG

LEG 1

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OPC cc: All parties of record

RCH

SEC 154909-17

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02034 FEB 20 1996

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**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

**JURIS.
FILE**

Resolution of Petition(s) to establish)	
nondiscriminatory rates, terms, and)	Docket No. 950985-TP
conditions for interconnection)	
involving local exchange companies and)	Filed: February 20, 1996
alternative local exchange companies)	
pursuant to Section 364.162, Florida)	
Statutes)	

**PREHEARING STATEMENT OF
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.
(Petition Concerning United/Centel)**

Pursuant to Rule 25-22.038(3), Florida Administrative Code and Order No. PSC-95-0888-PCO-TP, Metropolitan Fiber Systems of Florida, Inc. ("MFS-FL"), by its undersigned attorneys, hereby files this prehearing statement in the Commission's proceeding concerning its petition for interconnection with Sprint-United and Sprint-Centel ("United/Centel").

- (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 interconnection and other co-carrier arrangements (as defined by the list of issues in this proceeding) between MFS-FL and United/Centel and, in particular, the appropriate terminating access compensation mechanism. 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;**

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Timothy T. Devine, on behalf of MFS-FL, will sponsor Exhibits TTD-1 through TTD-8 attached to his Direct and Rebuttal Testimony in this docket. Exhibit TTD-1 through TTD-5 represent the correspondence between MFS-FL and United/Centel in their recent interconnection negotiations. Exhibit TTD-8 is an agreement signed between MFS-FL and GTE concerning many of the issues in this proceeding. Exhibit TTD-7 is an agreement between Intermedia and United/Centel. Exhibit TTD-6 is a chart describing the traffic flows between MFS and NYNEX in New York.

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

The principal issue to be resolved is reciprocal compensation between MFS-FL and United/Centel for local call termination. MFS-FL believes that the most efficient, administratively simple and equitable method of compensation for terminating access is the bill and keep method based on the in-kind exchange of traffic between co-carriers. Once United/Centel has conducted Long Run Incremental Cost ("LRIC") cost studies, reciprocal compensation should be based on the LRIC of interconnection. MFS-FL believes that it might be possible to sign an agreement with United/Centel as to a number of the co-carrier issues in this docket. Until such time, the positions of MFS-FL on each of the positions is detailed below.

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

1. Issue: 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 GTE?

Position: The appropriate interconnection "rate" for local traffic termination between MFS-FL and United/Centel is the bill and keep method of traffic exchange. Once LRIC studies are available, bill and keep should transition to LRIC-based rates. The Commission should conduct a full hearing to examine United/Centel cost studies. Where interconnection occurs via collocation, upon reasonable notice, MFS-FL would be permitted to change from one interconnection method to another with no penalty, conversion or rollover charges.

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

Position: Yes, United/Centel should tariff the interconnection rate(s) or other arrangements.

3. Issue: 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 respective ALECs' network?

Position: All carriers should be permitted to subtend the LEC tandem. Meet-point billing should follow established industry guidelines. Collocated ALECs should be permitted to cross-connect without transiting the United/Centel network. The carrier providing

terminating access should collect the RIC as is the case between United/Centel and independents today.

4. Issue: 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?

Position: ALECs cannot route 800 numbers to the appropriate carrier. United/Centel should be required to handle database queries and route ALEC 800 number calls to the appropriate carrier. They will be compensated for this by switched access billed to IXC's, and there should therefore be no fee for providing records.

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

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

Position: United/Centel must provide trunk connections to its 911/E-911 selective routers/911 tandems for the provision of 911/E911 services and for access to subtending Public Safety Answering Points ("PSAPs"). Interconnection should be made at the

Designated Network Interconnection Point ("D-NIP"). United/Centel should provide on-line access for immediate E-911 database updates.

6. Issue: 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?

Position: United/Centel should provide LEC-to-LEC Busy Line Verification and Interrupt ("BLV/I") trunks to one another to enable each carrier to support this functionality. MFS-FL and United/Centel should compensate one another for the use of BLV/I according to the effective rates listed in United/Centel's tariffs.

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

Position: The Commission should require United/Centel to list competing carriers' customers in their directory assistance databases. All LECs should be required to update their directory assistance databases with data provided by competitors on at least as timely a basis as they update these databases with information regarding their own customers.

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

Position: United/Centel should be required to list competing carriers' customers in their White and Yellow Pages directories, should be required to distribute these directories to ALEC customers at no charge, and should provide enhanced listings, all in the identical manner that it does for United/Centel customers.

9. Issue: 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?

Position: United/Centel and ALECs need to exchange records in an accurate and timely manner and therefore need to develop arrangements for the reciprocal exchange of a wide variety of information without the assessment of charges between carriers. For calls provided by United/Centel's interim number portability service, consolidated billing should be required.

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

Position: ALECs and United/Centel should provide LEC-to-LEC CCS to one another, where available, in conjunction with LATA-wide traffic. All CCS signaling parameters should be provided. United/Centel and MFS-FL should cooperate on the exchange of

Transactional Capabilities Application Part ("TCAP") messages to facilitate full interoperability of CCS-based features between their respective networks.

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

Position: ALECs and United/Centel should jointly establish at least one location per LATA as a Designated Network Interconnection Point ("D-NIP"). United/Centel should exchange traffic between its network and ALEC networks using reasonably efficient routing, trunking, and signaling arrangements. ALECs and United/Centel should reciprocally terminate LATA-wide traffic via two-way trunking arrangements.

12. Issue: 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?

Position: Switched access (toll) or local compensation (local) should still apply when calls are completed using interim number portability. United/Centel should compensate ALECs as if traffic were terminated directly to the ALEC. Interim number portability processing and billing procedures should be established herein.

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

Position: The Commission should establish reasonable arrangements to address transfer of service announcements, coordinated repair calls, information pages, and the operator reference database.

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

Position: It is the understanding of MFS-FL that United/Centel does not currently assign NXX codes.

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

MFS-FL and United/Centel have made progress in negotiations and might be able to sign an agreement with United/Centel on a number of co-carrier issues in this docket. To date, however, MFS-FL and United/Centel have not reached agreement on any issue.

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

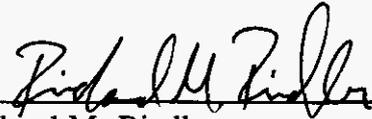
At this time, there are no pending motions or other matters that MFS-FL seeks action upon.

Prehearing Statement
Metropolitan Fiber Systems of Florida, Inc.
February 20, 1996
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- (i) a statement as to any requirement set forth in the prehearing order that cannot be complied with, and the reasons therefor.

None.

Respectfully submitted,



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Dated: February 19, 1996