

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI metro
Access Transmission Services LLC
and MCI WorldCom Communications,
Inc. for arbitration of certain
terms and conditions of a
proposed agreement with
BellSouth Telecommunications,
Inc. concerning interconnection
and resale under the
Telecommunications Act of 1996.

DOCKET NO. 000649-TP
FILED: SEPTEMBER 7, 2000

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-00-1342-PCO-TP, issued July 21, 2000, the Staff of the Florida Public Service Commission files its Prehearing Statement.

- A. All Known Witnesses
None.
- B. All Known Exhibits
None.
- C. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

- D. Staff's Position on the Issues

APP _____ ISSUE 1 Should the electronically ordered NRC apply in the event
CAF _____ an order is submitted manually when electronic interfaces are not
CMP _____ available or not functioning within specified standards or
COM 3 _____ parameters?
CTR _____

ECR _____
LEG _____ Position: Staff has no position at this time.
OPC _____

PAI _____
RGO _____
SEC 1 _____
SER _____
OTH _____

DOCUMENT NUMBER-DATE

11101 SEP-7 8 006136

FPSC-RECORDS/REPORTING

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ISSUE 2 What prices should be included in the Interconnection Agreements?

Position: Staff has no position at this time.

ISSUE 3 Should the resale discount apply to all telecommunication services BellSouth offers to end users, regardless of the tariff in which the service is contained?

Position: Staff has no position at this time.

ISSUE 4 How should the demarcation points for the access to UNEs be established?

Position: Staff has no position at this time.

ISSUE 5 Should BellSouth be required to provide OS/DA as a UNE?

Position: Staff has no position at this time.

ISSUE 6 Should BellSouth be directed to perform, upon request, the functions necessary to combine unbundled network elements that are ordinarily combined in its network?

Position: Staff has no position at this time.

ISSUE 7 Should BellSouth be required to combine network elements that are not ordinarily combined in its network?

Position: Staff has no position at this time.

ISSUE 7A Should BellSouth charge MCIW only for UNEs that it orders and uses, and should UNEs order and use by MCIW be considered part of its network for reciprocal compensation and switched access charges?

Position: Staff has no position at this time.

ISSUE 8 Should UNE specifications include non-industry standard, BellSouth proprietary specifications?

Position: Staff has no position at this time.

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ISSUE 9 Should MCIW be required to use a special construction process, with additional costs, to order facilities of the type normally used at a location, but not available at the time of the order?

Position: Staff has no position at this time.

ISSUE 11 Should MCIW access the feeder distribution interface directly or should BellSouth be permitted to introduce an intermediate demarcation device?

Position: Staff has no position at this time.

ISSUE 12 Should the Interconnection Agreements contain MCIW's proposed terms governing the provision of optical loop concentrators, intelligent loop concentrators, and DSLAMs as unbundled network elements?

Position: Staff has no position at this time.

ISSUE 15 When an MCIW customer served via the UNE-platform makes a directory assistance or operator call, must the ANI-II digits be transmitted to MCIW via Feature Group D signaling from the point of origination?

Position: Staff has no position at this time.

ISSUE 16 Should BellSouth be required to provide GR-303 equipped integrated digital loop carrier where it is available? Where such facilities are available, should BellSouth provide multi-hosting?

Position: Staff has no position at this time.

ISSUE 18 Is BellSouth required to provide all technically feasible unbundled dedicated transport between locations and equipment designated by MCIW so long as the facilities are used to provide telecommunications services, including interoffice transmission facilities to network nodes connected to MCIW switches and to the switches or wire centers of other requesting carriers?

Position: Staff has no position at this time.

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ISSUE 19 How should BellSouth be required to route OS/DA traffic to MCIW's operator services and directory assistance platforms?

Position: Staff has no position at this time.

ISSUE 22 Should the Interconnection Agreements contain MCIW's proposed terms addressing line sharing, including line sharing in the UNE-P and unbundled loop configurations?

Position: Staff has no position at this time.

ISSUE 23 Does MCIW's right to dedicated transport as an unbundled network element include SONET rings?

Position: Staff has no position at this time.

ISSUE 28 Should BellSouth provide the calling name database via electronic download, magnetic tape, or via similar convenient media?

Position: Staff has no position at this time.

ISSUE 29 Should calls from MCIW customers to BellSouth customers served via Uniserve, Zipconnect, or any other similar service, be terminated by BellSouth from the point of interconnection in the same manner as other local traffic, without a requirement for special trunking?

Position: Staff has no position at this time.

ISSUE 32 Should there be any charges for use of a joint optical interconnection facility built 50% by each party?

Position: Staff has no position at this time.

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ISSUE 33 Does MCIW have the right to require interconnection via a Fiber Meet Point arrangement, jointly engineered and operated as a SONET Transmission System (SONET ring) whether or not that SONET ring presently exists in BellSouth's network?

Position: Staff has no position at this time.

ISSUE 34 Is BellSouth obligated to provide and use two-way trunks that carry each party's traffic?

Position: Staff has no position at this time.

ISSUE 35 If the parties ever choose to implement a combination trunk group, should that trunk group be operated as a two-way trunk?

Position: Staff has no position at this time.

ISSUE 36 Does MCIW, as the requesting carrier, have the right pursuant to the Act, the FCC's Local Competition Order, and FCC regulations, to designate the network point (or points) of interconnection at any technically feasible point?

Position: Staff has no position at this time.

ISSUE 37 Should BellSouth be permitted to require MCIW to fragment its traffic by traffic type so it can interconnect with BellSouth's network?

Position: Staff has no position at this time.

ISSUE 39 How should Wireless Type 1 and Type 2A traffic be treated under the Interconnection Agreements?

Position: Staff has no position at this time.

ISSUE 40 What is the appropriate definition of internet protocol (IP) and how should outbound voice calls over IP telephony be treated for purposes of reciprocal compensation?

Position: Staff has no position at this time.

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ISSUE 42 Should MCIW be permitted to route access traffic directly to BellSouth end offices or must it route such traffic to BellSouth's access tandem?

Position: Staff has no position at this time.

ISSUE 43 When the ANI, CPN and BTN are not available, should the parties be required to include in the information transmitted with the call the NPA/NXX associated with the trunk group or the telephone number associated with the trunk group?

Position: Staff has no position at this time.

ISSUE 45 How should third party transit traffic be routed and billed by the parties?

Position: Staff has no position at this time.

ISSUE 46 Under what conditions, if any, should the parties be permitted to assign an NPA/NXX code to end users outside the rate center in which the NPA/NXX is homed?

Position: Staff has no position at this time.

ISSUE 47 Should reciprocal compensation payments be made for ISP bound traffic?

Position: Staff has no position at this time.

ISSUE 51 Under what circumstances is BellSouth required to pay tandem charges when MCIW terminates BellSouth local traffic?

Position: Staff has no position at this time.

ISSUE 53 Should call jurisdiction be based on the calling party number or on jurisdictional factors that represent averages?

Position: Staff has no position at this time.

ISSUE 53A Should MCIW be required to utilize direct end office trunking in situations involving tandem exhaust or excessive traffic volumes?

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Position: Staff has no position at this time.

ISSUE 54 Should security charges be assessed for collocation in offices with existing card key systems, and how should security costs be allocated in central offices where new card key systems are being installed?

Position: Staff has no position at this time.

ISSUE 56 Should BellSouth be required to provide DC power to adjacent collocation space?

Position: Staff has no position at this time.

ISSUE 57 Should the Interconnection Agreements include MCIW's proposed terms and conditions regarding virtual collocation?

Position: Staff has no position at this time.

ISSUE 59 Should collocation space be considered complete before BellSouth has provided MCIW with cable facility assignments ("CFAs")?

Position: Staff has no position at this time.

ISSUE 60 Should BellSouth provide MCIW with specified collocation information at the joint planning meeting?

Position: Staff has no position at this time.

ISSUE 61 Should the per ampere rate for the provision of DC power to MCIW's collocation space apply to amps used or to fused capacity?

Position: Staff has no position at this time.

ISSUE 63 Is MCIW entitled to use any technically feasible entrance cable, including copper facilities?

Position: Staff has no position at this time.

ISSUE 64 Is MCIW entitled to verify BellSouth's assertion, when made, that dual entrance facilities are not available? Should

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BellSouth maintain a waiting list for entrance space and notify MCIW when space becomes available?

Position: Staff has no position at this time.

ISSUE 65 What information must BellSouth provide to MCIW regarding vendor certification?

Position: Staff has no position at this time.

ISSUE 66 What industry guidelines or practices should govern collocation?

Position: Staff has no position at this time.

ISSUE 67 When MCIW has a license to use BellSouth rights-of-way, and BellSouth wishes to convey the property to a third party, should BellSouth be required to convey the property subject to MCIW's license?

Position: Staff has no position at this time.

ISSUE 68 Should BellSouth require that payments for make-ready work be made in advance?

Position: Staff has no position at this time.

ISSUE 75 For end users served by INP, should the end user or the end user's local carrier be responsible for paying the terminating carrier for collect calls, third party billed calls or other operator assisted calls?

Position: Staff has no position at this time.

ISSUE 76 Should BellSouth be required to develop the industry standard EDI pre-ordering interface (REDI) without charging MCIW for the up-front development costs?

Position: Staff has no position at this time.

ISSUE 78 How should credit information be provided to MCIW?

Position: Staff has no position at this time.

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ISSUE 80 Should BellSouth be required to provide an application-to-application access service order inquiry process?

Position: Staff has no position at this time.

ISSUE 81 Should BellSouth provide a service inquiry process for local services as a pre-ordering function?

Position: Staff has no position at this time.

ISSUE 83 Should BellSouth be required to provide downloads of the RSAG database without license agreements?

Position: Staff has no position at this time.

ISSUE 84 Should the parties be required to develop jointly an implementation plan for the ordering of local switching in combination with unbundled loops, including UNE-P?

Position: Staff has no position at this time.

ISSUE 85 What procedures should be used for PIC changes?

Position: Staff has no position at this time.

ISSUE 87 Should MCIW be required to pay for expedited service when BellSouth provides service after the offered expedited date, but prior to BellSouth's standard interval?

Position: Staff has no position at this time.

ISSUE 88 For customer premises installations, should BellSouth be required, at MCIW's request, to cable from the demarcation point to the customer's equipment location in accordance with BellSouth's procedures and at parity with the provision of such services to BellSouth's customers?

Position: Staff has no position at this time.

ISSUE 89 When BellSouth rejects an MCIW order, should it be required to identify all errors in the order that would cause it to be rejected?

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Position: Staff has no position at this time.

ISSUE 90 Should BellSouth be required to provide completion notices for manual orders?

Position: Staff has no position at this time.

ISSUE 91 What intervals should apply to FOCs? Should BellSouth be required to check facilities before returning an FOC?

Position: Staff has no position at this time.

ISSUE 92 Should the parties be required to follow the detailed guidelines proposed by MCIW with respect to LNP orders?

Position: Staff has no position at this time.

ISSUE 93 By when must the parties bill for previously unbilled amounts? By when must they submit bills to one another?

Position: Staff has no position at this time.

ISSUE 94 Should BellSouth be permitted to disconnect service to MCIW for nonpayment?

Position: Staff has no position at this time.

ISSUE 95 Should BellSouth be required to provide MCIW with billing records with all EMI standard fields?

Position: Staff has no position at this time.

ISSUE 96 Should BellSouth be required to give written notice when a central office conversion will take place before midnight or after 4 a.m.?

Position: Staff has no position at this time.

ISSUE 96A Should BellSouth be required to provide customer service record (CSR) information in a format that permits its use in completing an order for service?

Position: Staff has no position at this time.

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ISSUE 97 Should BellSouth be required to provide MCIW with notice of changes to NPA/NXXs linked to Public Safety Answering Points as soon as such changes occur?

Position: Staff has no position at this time.

ISSUE 98 Should BellSouth be required to provide the 911 information and comply with 911 trunking requirements proposed by MCIW?

Position: Staff has no position at this time.

ISSUE 99 Should BellSouth be required to provide MCIW with 10 digit PSAP numbers?

Position: Staff has no position at this time.

ISSUE 100 Should BellSouth operators be required to ask callers for their carrier of choice when such callers request a rate quote or time and charges?

Position: Staff has no position at this time.

ISSUE 101 Is BellSouth required to provide shared transport in connection with the provision of custom branding? Is MCIW required to purchase dedicated transport in connection with the provision of custom branding?

Position: Staff has no position at this time.

ISSUE 102 Should the parties provide "inward operator services" through local interconnection trunk groups using network routable access codes BellSouth establishes through the LERG?

Position: Staff has no position at this time.

ISSUE 103 Should BellSouth operators be required to connect MCIW subscribers dialing "0" and requesting directory assistance to any directory assistance platform designated by MCIW?

Position: Staff has no position at this time.

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ISSUE 105 What performance measurement system should BellSouth be required to provide?

Position: Staff has no position at this time.

ISSUE 106 Should the Interconnection Agreements contain a provision establishing that BellSouth will provide services in any combination requested by MCIW?

Position: Staff has no position at this time.

ISSUE 107 Should the parties be liable in damages, without a liability cap, to one another for their failure to honor in one or more material respects any one or more of the material provisions of the Agreements?

Position: Staff has no position at this time.

ISSUE 108 Should MCIW be able to obtain specific performance as a remedy for BellSouth's breach of contract?

Position: Staff has no position at this time.

ISSUE 109 Should BellSouth be required to permit MCIW to substitute more favorable terms and conditions obtained by a third party through negotiation or otherwise, effective as of the date of MCIW's request. Should BellSouth be required to post on its website all BellSouth's interconnection agreements with third parties within fifteen days of the filing of such agreements with the FPSC?

Position: Staff has no position at this time.

ISSUE 110 Should BellSouth be required to take all actions necessary to ensure that MCIW confidential information does not fall into the hands of BellSouth's retail operations, and should BellSouth bear the burden of proving that such disclosure falls within enumerated exceptions?

Position: Staff has no position at this time.

ISSUE 111 Should MCIW's proposed procedures be followed for reporting and auditing of PIUs and PLUs?

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Position: Staff has no position at this time.

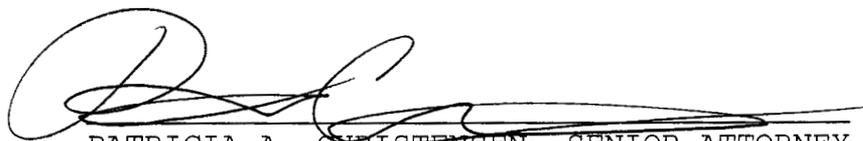
E. Pending Motions
None.

F. Pending Confidentiality Claims or Requests
None.

G. Compliance with Orders Nos. PSC-00-1324-PCO-TP, and PSC-00-1560-PCO-TP, issued August 30, 2000

Staff has complied with all requirements of the Order Establishing Procedure and Second Order Modifying Order Establishing Procedure entered in this docket.

Respectfully submitted this 7th day of September, 2000.



PATRICIA A. CHRISTENSEN, SENIOR ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Commission Staff's Prehearing Statement has been furnished to Donna Canzano McNulty, Esquire, MCI WorldCom, Inc., 325 John Knox Road, Suite 105, Tallahassee, Florida, 32303; and that a true and correct copy thereof has been furnished to Nancy White, c/o Nancy Sims, Esquires, BellSouth Telecommunication, Inc., 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301-1556, by mail, this 7th day of September, 2000.



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