BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment of)	
Operations Support Systems Permanent)	Docket No. 000121-TP
Performance Measures for Incumbent Local)	Filed: April 2, 2001
Exchange Telecommunications Companies)	
)	

PREHEARING STATEMENT OF e.spire COMMUNICATIONS, INC.

American Communication Services of Jacksonville, Inc. d/b/a e.spire Communications, and ACSI Local Switched Services, Inc. d/b/a e.spire Communications, Inc. (collectively "e.spire" or the "Company"), through undersigned counsel, submits this prehearing statement.

A. APPEARANCES

Norman H. Horton, Jr., Esq. Floyd R. Self, Esq. Messer, Caparello & Self, P.A. Post Office Box 1876 Tallahassee, FL 32302-1876 Renee Terry, Esq. e.spire Communications, Inc. 131 National Business Parkway, Suite 100 Annapolis Junction, MD 20701

On behalf of e.spire Communications, Inc.

B. WITNESSES

Witness
James C. Falvey
(Direct Testimony)

Subject Matter
e.spire experiences with
BellSouth OSS

C. EXHIBITS

D. BASIC POSITION

The Commission should adopt adequate performance measurements and remedies that are sufficient to ensure that BellSouth provides timely services to e.spire and other ALECs. Measurements and remedies are necessary in order to ensure that the services provided to e.spire is

DOCUMENT NUMBER-DATE

04077 APR-25

at parity with the services BellSouth provides to itself and its affiliates and to ensure that the industry is open to competition.

E. ISSUES AND POSITIONS

e.spire has offered testimony to provide examples of the need for quality measurements. As to the appropriate measures and the specific issues, e.spire concurs with the positions offered by the ALEC Coalition.

F. PENDING MOTIONS

e.spire Communications, Inc. has no pending motions.

G. REQUIREMENTS THAT CANNOT BE COMPLIED WITH

All requirements of the procedural order can be met by e.spire Communications, Inc.

Dated this 2nd day of April, 2001.

Respectfully submitted,

NORMAN H. HORTON, JR.

FLOYD R. SELF

Messer, Caparello & Self, P.A.

Post Office Box 1876

Tallahassee, FL 32302-1876

(850) 222-0720

Attorneys for e.spire Communications, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Prehearing Statement of e.spire Communications, Inc. in Docket No. 000121-TP has been served upon the following parties by Hand Delivery (*) and/or U.S. Mail this 2nd day of April. 2001.

Tim Vaccaro, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy B. White, Esq. c/o Ms. Nancy H. Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, FL 32301

Angela Green, Esq.
Florida Public Telecommunications
Association
125 S. Gadsden St., Suite 200
Tallahassee, FL 32301

Charles J. Rehwinkel, Esq. Susan Masterton, Esq. Mr. F. Ben Poag Sprint-Florida, Incorporated MC FLTHO0107 P.O. Box 2214 Tallahassee, FL 32399-2214

Michael A. Gross, Esq.
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecommunications Association, Inc.
246 East 6th Avenue
Tallahassee, FL 32303

Donna McNulty, Esq. WorldCom, Inc. The Atrium Building, Suite 105 325 John Knox Road Tallahassee, FL 32303

J. Jeffry Wahlen, Esq. Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302 Peter M. Dunbar, Esq.
Pennington, Moore, Wilkinson, Bell &
Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302-2095

Ms. Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069

Marsha Rule, Esq. AT&T 101 N. Monroe St., Suite 700 Tallahassee, FL 32301

Kenneth A. Hoffman, Esq. John R. Ellis, Esq. Rutledge, Ecenia, Purnell & Hoffman, P.A. P.O. Box 551 Tallahassee, FL 32302

Mr. Dulaney L. O'Roark, III WorldCom, Inc. 6 Concourse Parkway, Suite 3200 Atlanta, GA 30328

Kimberly Caswell, Esq. Verizon Select Services, Inc. P.O. Box 110, FLTC0007 Tampa, FL 33601-0110

Monica Barone, Esq. Birch Telecom of the South, Inc. 8001 Fairlake Drive Wake Forest, NC 27587

Mr. Tad J. Sander Birch Telecom of the South, Inc. 2020 Baltimore Avenue Kansas City, MO 64108-1914 Jeremy Marcus, Esq.
Blumenfeld & Cohen
1625 Massachusetts Avenue, NW, Suite 300
Washington, DC 20036

Catherine F. Boone, Esq. Covad Communications Company 10 Glenlake parkway, Suite 650 Atlanta, GA 30328-3495

Richard Melson, Esq. Hopping Law Firm P.O. Box 6526 Tallahassee, FL 32314

Scott Sapperstein, Esq. Intermedia Communications, Inc. One Intermedia Way, M.C. FLT-HQ3 Tampa, FL 33647-1752

Nanette Edwards, Esq. Brian Musselwhite, Esq. ITC^Deltacom 4092 South Memorial parkway Huntsville, AL 35802

Patrick Wiggins, Esq. Charles Pellegrini, Esq. Katz Kutter Law Firm 106 East College Avenue, 12th Floor Tallahassee, FL 32301

Jonathan Canis, Esq. Michael Hazzard, Esq. Kelley Law Firm 1200 19th Street, NW Fifth Floor Washington, DC 20036

Mr. John D. McLaughlin, Jr. KMC Telecom, Inc. 1755 North Brown Road Lawrenceville, GA 30043

Joseph McGlothlin, Esq. Vicki Kaufman, Esq. McWhirter Law firm 117 S. Gadsden Street Tallahassee, FL 32301

Laura L. Gallagher, P.A. 101 E. College Avenue, Suite 302 Tallahassee, FL 32301 Ms. Kimberly A. Scardino Rhythms Links, Inc. 1625 Massachusetts Avenue, NW, Suite 300 Washington, DC 20036

Ms. Carol Paulsen SBC Telecom, Inc. 5800 Northwest Parkway Suyite 125, 1-Q-01 San Antonio, TX 78249

Wayne Stavanja, Esq.
Mark Buechele, Esq.
supra Telecom
1311 Executive Center Drive, Suite 200
Tallahassee, FL 32301

Mr. John Rubino Mr. George S. Ford Z-Tel Communications, Inc. 601 S. Harbour Island Blvd. Tampa, FL 33602-5706

Suzanne F. Summerlin 1311-B Paul Russell Road, Suite 201 Tallahassee, FL 32301

Norman H. Horton, Jr.