

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Intermedia)
Communications of Florida, Inc.)
for expanded interconnection for) Docket No. 921074-TP
AAVs within LEC central offices.)

PREHEARING STATEMENT OF TELEPORT COMMUNICATIONS GROUP INC.

Teleport Communications Group Inc. (TCG) hereby submits its prehearing statement pursuant to Rule 25-22.038(3) of the Commission's rules of practice and procedure and the Commission's Order Establishing Procedure in this docket.

- (A) Paul Kouroupas will testify on behalf of TCG to respond to the list of issues identified by the Commission in this docket. Mr. Kouroupas will address all the issues raised by the Commission and TCG.
- (B) TCG does not currently plan to offer exhibits into the record.
- (C) TCG's basic position in this proceeding is that the Commission should grant Intermedia's petition for an order permitting AAV provision of special access and switched access services through collocation arrangements in local exchange company central offices. Expanded interconnection is in the public interest and will bring significant benefits to consumers in Florida. TCG further asserts that Chapter 364 of the Florida Statutes authorizes the Commission to implement expanded interconnection and TCG wishes to offer testimony on the details of this implementation.
- (D) TCG concurs with the Commission's list of issues in the Order Establishing Procedure as the questions of fact which are relevant to this proceeding. Paul Kouroupas has addressed these questions in his direct filed testimony on behalf of TCG.
- (E) TCG considers the relevant question of law in this proceeding to be whether or not the Commission may require expanded interconnection under Chapter 364 of the Florida statutes. TCG asserts that the section grants the Commission exclusive jurisdiction over telecommunications and directs the Commission to encourage competition. Collocation and interconnection are two essential elements of full and effective competition and the Commission may implement them in

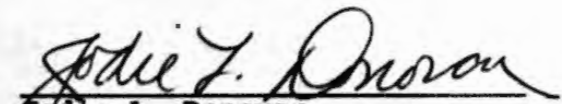
the public interest.

- (F) TCG considers the most significant policy question in this proceeding to be whether or not expanded interconnection is in the public interest, to which the answer is yes.

TCG suggests that there is one policy question at issue which the Commission has not addressed in the Order Establishing Procedure. The question is whether the Commission should institute "freedom of choice" policies so that LECs do not impede effective competition by instituting unreasonable terms and conditions in their collocation tariffs or by charging discriminatory central office reconfiguration rates or other practices. TCG further asserts that the LECs should not be permitted to impose termination liabilities on customers which have been locked into a long term contract but want to switch to a competitive access provider when expanded interconnection is in place.

- (G) TCG has not stipulated to any issues.
- (H) TCG does not currently have any pending matters before the Commission. The Commission granted its petition to intervene in this proceeding on June 24, 1993 in Order No. PSC-93-0948-PCO-TP.
- (I) TCG can comply with the all the Commission's requirements set forth in the Order Establishing Procedure.

Respectfully submitted,



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Dated: July 7, 1993