



Florida Cable Television Assoc., Inc.  
**STEVEN E. WILKERSON**  
 President

**FLORIDA CABLE TELEVISION ASSOCIATION, INC.**

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 ADMINISTRATION  
 MAIL ROOM

August 12, 1994

**921077-TP**

Donna L. Canzano, Esq.  
 Division of Legal Services  
 Florida Public Service Commission  
 101 E. Gaines Street  
 Tallahassee, Florida 32399

Dear Donna:

Pursuant to the Prehearing Officer's instructions at the August 10, 1994 Prehearing Conference, following are the Florida Cable Television Association, Inc.'s ("FCTA") and Time Warner AxS, Limited Partnership's ("Time Warner") prehearing positions on Issues 12, 22, and 23 and our positions on the proposed stipulations.

**Prehearing Positions**

Issue 12:

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_ No. At this juncture, such a mandate would be premature and would serve no purpose.
- APP \_\_\_\_\_ However, with a statutory change and the development of local competition, telecommunications may evolve to become a network of networks. With those changes, some form of mutual
- CAF \_\_\_\_\_ interconnection will be necessary in order to complete calls on competitive networks.
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- DPC \_\_\_\_\_
- RCH \_\_\_\_\_
- REC 1 \_\_\_\_\_
- VAS \_\_\_\_\_
- WTH \_\_\_\_\_

Issue 22:

FCTA takes no position.

Issue 23:

Imputation reduces incentives to inappropriately assign costs to essential network elements. Imputation guidelines should continue to require that switched access charges, not actual costs, be covered by LEC toll rates. The Commission should address the subject of imputation in a broader context after this proceeding is concluded.

DOCUMENT NUMBER-DATE

**08265 AUG 15 94**

FPSC-RECORDS/REPORTING

### **Proposed Stipulations**

FCTA and Time Warner agree to stipulate to the following language for Issues 1, 2, 9, 11 and 13 only.

**Issue 1:** How is switched access provisioned and priced today?

**STIPULATION:** Switched access service uses a local exchange company's switching facilities to provide a communications pathway between an interexchange company's terminal location and an end user's premises. Switched access is provisioned under a feature group arrangement. There are four feature groups: FGA, FGB, FGC, and FGD. These categories are distinguished by their technical characteristics, e.g. the connection to the central office is line side or trunk side. Rate elements differ by name according to the respective local exchange company. Rate elements typically include local switching, carrier common line, local transport, and carrier access capacity. Rate elements are currently priced under the equal charge rule. This means that each unit is priced the same as the next unit for a given rate element. Rates and charges include recurring, nonrecurring, and usage.

**Issue 2:** How is local transport priced and provisioned today?

**STIPULATION:** Local transport, as mentioned in Issue 1, is one of the switched access rate elements. Local transport is currently priced on a usage sensitive basis. The rate is applied on a per minute of use basis. Regardless of distance all transport minutes of use are assessed the same rate per minute of use.

**Issue 9:** Which LECs should provide switched access expanded interconnection?

**STIPULATION:** Only Tier 1 LECs (Southern Bell, GTEFL, United, and Centel) shall be required to offer switched access expanded interconnection.

If a non-Tier 1 LEC receives a bona fide request for expanded interconnection but the terms and conditions cannot be negotiated by the parties, the Commission shall review such a request on a case-by-case basis. If the parties agree on expanded interconnection, the terms and conditions shall be set by individual negotiation.

**Issue 11:** Which entities should be allowed expanded interconnection for switched access?

**STIPULATION:** Any entity shall be allowed to interconnect on an intrastate basis its own basic transmission facilities associated with terminating equipment and multiplexers except entities restricted pursuant to Commission rules, orders and statutes.

**Issue 13:** Should the Commission allow switched access expanded interconnection for non-fiber optic technology?

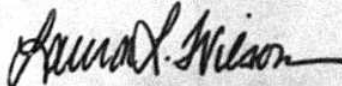
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**STIPULATION:** Yes. The Commission shall allow expanded interconnection of non-fiber optic technology on a central office basis where facilities permit. The actual location of microwave technology shall be negotiated between the LEC and the interconnector.

Please feel free to contact either myself or Peter M. Dunbar (222-3533) with any questions.

Yours very truly,



Laura L. Wilson  
Regulatory Counsel

c: All Parties of Record  
Steven E. Wilkerson  
Robert J. Brillante