BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION



In re: Resolution of petition(s) to establish nondiscriminatory)	Docket	No. 950985-TP
rates, terms, and conditions for interconnection involving local exchan companies pursuant to Section 364.162, Florida Statutes		Filed:	09/29/95

INTERMEDIA COMMUNICATIONS OF FLORIDA, INC.'s PREHEARING STATEMENT

Intermedia Communications of Florida, Inc. (ICI), pursuant to Order No. PSC-95-1084-PCO-TP, files this prehearing statement.

Α. <u>Witnesses:</u> None

WAS

- В. Exhibits: At this time, ICI does not plan to introduce exhibits, but reserves the right to introduce cross-examination exhibits if necessary.
- ICI's Basic Position: No position pending discovery. C.

		, D.		<u>issues</u>				
CK								
FΑ		ISSUE 1:	What is (are)	the appropriate	interconnection ra	te		
bΰ		structure exchange	e, interconnection of local and toll	rate(s), or othe traffic between	r arrangements for t Teleport and Southe	he rn		
AF) Chas	Bell?			•			
O TR) alias		ICI's POSITION:	No position pend	ing discovery.			
7-G .2G		ISSUE 2: or other	Should Southern larrangements?	Bell tariff the i	nterconnection rate(s)		
](V](V)	5_		ICI's POSITION:	No position pend	ing discovery.			

DOCUMENT NUMBER-DATE 09721 SEP 29 # FPSC-RECORDS/REPORTING

ISSUE 3: What are the appropriate technical and financial billing arrangements which should govern interconnection between TCG and BellSouth for the delivery of calls originated and/or terminated from carriers not directly connected to TCG's network?

ICI's POSITION: No position pending discovery.

ISSUE 4: What are the appropriate technical and financial requirements for the exchange of intraLATA 800 traffic which originates from a TCG customer and terminates to an 800 number served by BellSouth?

ICI's POSITION: No position pending discovery.

ISSUE 5(a): What are the appropriate technical arrangements for the interconnection of TCG's network to BellSouth's 911 provisioning network such that TCG's customers are ensured the same level of 911 service as they would receive as a customer of BellSouth?

ICI's POSITION: No position pending discovery.

<u>ISSUE 5(b)</u>: What procedures should be in place for the timely exchange and updating of TCG customer information for inclusion\ in appropriate E911 databases?

ICI's POSITION: No position pending discovery.

<u>ISSUE 6</u>: What are the appropriate technical requirements for operator traffic flowing between TCG's operator services provider and BellSouth's operator services provider including busy line verification and emergency interrupt services?

ICI's POSITION: No position pending discovery.

<u>ISSUE 7</u>: Under what terms and conditions should BellSouth be required to list TCG's customers in its directory assistance database?

ICI's POSITION: No position pending discovery.

ISSUE 8: Under what terms and conditions should BellSouth be required to list TCG's customers in its universal white and yellow pages directories and to publish and distribute these directories to TCG's customers?

ICI's POSITION: No position pending discovery.

ISSUE 9: What arrangements are necessary to ensure that TCG can bill and clear credit card, collect, third party calls and audiotext calls?

ICI's POSITION: No position pending discovery.

<u>ISSUE 10</u>: What arrangements are necessary to ensure the provision of CLASS/LASS services between TCG's and BellSouth's interconnected networks?

ICI's POSITION: No position pending discovery.

- E. QUESTIONS OF LAW: None.
- F. POLICY QUESTIONS: None.
- G. STIPULATED ISSUES: None.
- H. PENDING MOTIONS OR OTHER MATTERS: None.
- I. REQUIREMENTS THAT CANNOT BE COMPLIED WITH: None.

Respectfully submitted this 29th day of September, 1995.

PATRICK K. WIGGINS

WIGGINS & VILLACORTA, P.A. Post Office Drawer 1657 Tallahassee, Florida 32302

(904) 222-1534

Counsel for INTERMEDIA COMMUNICATIONS OF FLORIDA, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of Intermedia Communications of Florida, Inc.'s Prehearing Statement in Docket No. 950985-TP has been furnished this 29th day of September, 1995, to the following:

Donna Canzano
Staff Counsel
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Charles Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street, Rm. 812
Tallahassee, FL 32399-1400

Clay Phillips Utilities & Telecommunications Room 410 House Office Building Tallahassee, FL 32399

Nels Roseland
Executive Office of
the Governor
Office of Planning and Budget
The Capitol, Room 1502
Tallahassee, FL 32399-0001

Greg Krasovsky Commerce & Economic Opportunities Room 426 Senate Office Bldg. Tallahassee, FL 32399

Lee L. Willis
J. Jeffry Wahlen
Macfarlane, Ausley, Ferguson
and McMullen
227 S. Calhoun St.
Tallahassee, FL 32301

Charles Murphy
Pennington Haben
Second Floor
215 S. Monroe Street
Tallahassee, FL 32302

Kimberly Caswell c/o Nancy H. Sims Southern Bell 150 S. Monroe St., Ste. 400 Tallahassee, FL 32301

Gary T. Lawrence City of Lakeland 501 East Lemon Street Lakeland, FL 33801-5079

Steven D. Shannon MCI Metro Access Transmission Services, Inc. 2250 Lakeside Blvd. Richardson, TX 75082

Andrew D. Lipman
Metropolitan Fiber Systems
of Florida, Inc.
One Tower Lane, Suite 1600
Oakbrook Terrace, IL 60181-4630

F. Ben Poag Sprint/United - Florida Sprint/Centel - Florida Post Office Box 16500 (M.C. #5326) Altamonte Springs, FL 32716

Richard D. Melson Hopping, Green, Sams & Smith Post Office Box 6526 Tallahassee, FL 32314 CERTIFICATE OF SERVICE DOCKET NO. 950985-TP

James C. Falvey Swidler & Berlin, Chartered 3000 K St., NW, Ste. 300 Washington, D.C. 20007

Kenneth A. Hoffman
Rutledge, Ecenia, Underwood,
 and Hoffman
215 S. Monroe, St., Ste. 420
Tallahassee, FL 32301

David B. Erwin Young, van Assenderp, et al Post Office Box 1833 Tallahassee, FL 32301

Graham A. Taylor TCG South Florida 1001 W. Cypress Creek Road Suite 209 Ft. Lauderdale, FL 33309-1949

John Murray Payphone Consultants, Inc. 3431 N.W. 55th Street Ft. Lauderdale, FL 33309-6308

Leo I. George Winstar Wireless of Florida, Inc. 1146 19th Street, N.W. Suite 200 Washington, D.C. 20036 Gary T. Lawrence City of Lakeland 501 East Lemon Street Lakeland, FL 33801-5079

Patrick K. Wiggins