

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Resolution of petition(s) to) DOCKET NO.
establish nondiscriminatory) 950985-TP
rates, terms and conditions)
for interconnection involving) FILED:
local exchange companies and) DECEMBER 22, 1995
alternative local exchange)
companies pursuant to Section)
364.162, Florida Statutes)
_____)

CONTINENTAL'S AMENDED PREHEARING STATEMENT

Continental Cablevision, Inc., on behalf of its affiliates, Continental Fiber Technologies, Inc. d/b/a AlterNet, and Continental Florida Telecommunications, Inc. (collectively "Continental"), pursuant to Orders Nos. PSC-95-1084-PCO-TP issued August 30, 1995, and PSC-95-1421-PCO-TP issued November 22, 1995, and Rule 25-22.038(3), Florida Administrative Code, respectfully submits the following Amended Prehearing Statement in the above-captioned docket.

A. WITNESSES

None.

B. EXHIBITS

None.

C. BASIC POSITION

Continental and BellSouth Telecommunications, Inc. have reached a settlement of the issues in this proceeding. Along with various other parties to this docket, Continental and BellSouth entered into the Stipulation and Agreement ("the Stipulation") that was approved by the Commission at its Agenda

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FPSC-RECORDS/REPORTING

Conference on December 19, 1995. The Stipulation contains provisions that govern the technical, financial and operational aspects of interconnection. Continental believes that these provisions are reasonable and appropriate for the Commission to adopt in resolution of the issues in this docket.

D. ISSUES AND POSITIONS

Continental offers the following prehearing positions on the questions of law, fact and public policy identified for disposition in this docket:

Where the term "ALECs" is used herein, it refers to Teleport, Continental, MFS, MCImetro, and Time Warner/DMP.

ISSUE 1: What are the appropriate rate structures, interconnection rates, or other compensation arrangements for the exchange of local and toll traffic between the respective ALECs and BellSouth?

POSITION: The interconnection rates contained in the Stipulation are reasonable. Continental urges the Commission to adopt these rates and the other interconnection provisions of the Stipulation in resolution of this issue.

ISSUE 2: If the Commission sets rates, terms, and conditions for interconnection between the respective ALECs and BellSouth, should BellSouth tariff the interconnection rate(s) or other arrangements?

POSITION: No position at this time.

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

POSITION: The technical and financial arrangements contained in the Stipulation that govern the interconnection of calls originated and/or terminated from carriers not directly connected to the respective ALECs' network are appropriate, and Continental urges the Commission to adopt them in resolution of this issue.

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

POSITION: The technical and financial requirements for the exchange of intraLATA 800 traffic contained in the Stipulation are appropriate, and Continental urges the Commission to adopt them in resolution of this issue.

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

POSITION: The technical arrangements for the interconnection of the respective ALEC's network to BellSouth's 911 provisioning network contained in the Stipulation are appropriate, and Continental urges the Commission to adopt them in resolution of this issue. Additionally, Continental urges the Commission to adopt the policy that the respective ALECs may provide trunks directly to the provider of emergency services.

ISSUE 5(b): What procedures should be in place for the timely exchange and updating of the respective ALEC's customer information for inclusion in appropriate E911 databases?

POSITION: The procedures provided in the Stipulation for exchanging and updating customer information for inclusion in E911 databases are appropriate, and Continental urges the Commission to adopt them in resolution of this issue.

ISSUE 6: What are the appropriate technical and financial requirements for operator handled traffic flowing between the respective ALECs and BellSouth including busy line verification and emergency interrupt services?

POSITION: The requirements provided in the Stipulation for operator-handled traffic flowing between the respective ALECs and BellSouth are appropriate, and Continental urges the Commission to adopt them in resolution of this issue.

ISSUE 7: What are the appropriate arrangements for the provision of directory assistance services and data between the respective ALECs and BellSouth?

POSITION: The arrangements for the provision of directory assistance services and data between the respective ALECs and BellSouth are appropriate, and Continental urges the Commission to adopt them in resolution of this issue.

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

POSITION: The terms and conditions for listing the respective ALECs' customers in BellSouth directories and for publishing and distribution the directories found in

the Stipulation are appropriate, and Continental urges the Commission to adopt them in resolution of this issue.

ISSUE 9: What are the appropriate arrangements for the provision of billing and collection services between the respective ALECs and BellSouth, including billing and clearing credit card, collect, third party and audiotext calls?

POSITION: The arrangements for billing and collection services between the respective ALECs and BellSouth that are provided in the Stipulation are appropriate, and Continental urges the Commission to adopt them in resolution of this issue.

ISSUE 10: What arrangements are necessary to ensure the provision of CLASS/LASS services between the respective ALECs and BellSouth's networks?

POSITION: The arrangements for providing CLASS/LASS services between the respective ALECs and BellSouth in the Stipulation are appropriate, and Continental urges the Commission to adopt them in resolution of this issue.

ISSUE 11: What are the appropriate arrangements for physical interconnection between the respective ALECs and BellSouth, including trunking and signalling arrangements?

POSITION: The physical interconnection arrangements and procedures contained in the Stipulation are appropriate, and Continental urges the Commission to adopt them in resolution of this issue.

ISSUE 12: To the extent not addressed in the number portability docket, Docket No. 950737-TP, what are the appropriate financial and operational arrangements for interexchange calls terminated to a number that has been "ported" to the respective ALECs?

POSITION: The financial and operational arrangements and procedures concerning such calls to "ported" numbers contained in the Stipulation are appropriate, and Continental urges the Commission to adopt them in resolution of this issue.

ISSUE 13: What arrangements, if any, are necessary to address other operational issues?

POSITION: The procedures for resolving operational issues, as they arise, which are contained in the Stipulation are appropriate, and Continental urges the Commission to adopt them as the appropriate method of resolving such issues in resolution of this issue.

ISSUE 14: What arrangements, if any, are appropriate for the assignment of NXX codes to the respective ALECs?

POSITION: The arrangements for assigning NXX codes contained in the Stipulation are appropriate, and Continental urges the Commission to adopt them in resolution of this issue.

E. STIPULATIONS

Continental entered into the Stipulation with BellSouth and various other parties to this docket on December 8, 1995. The Stipulation was approved by the Commission on December 19, 1995, thereby resolving all issues in this docket between Continental and BellSouth.

F. PENDING MOTIONS

On December 8, 1995, the Stipulation was filed in this docket under a Joint Motion for Acceptance of Stipulation and Agreement and for Partial Stay of Proceedings. Continental believes that the Commission, through its December 19th action approving the Stipulation, has granted this motion in substance.

G. OTHER REQUIREMENTS

Continental is not aware at this time of any requirements of the orders establishing procedure with which it cannot comply.

RESPECTFULLY SUBMITTED this 22th day of November, 1995.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the Amended Prehearing Statement of Continental Cablevision, Inc., were furnished by hand delivery (*) or by mail (**) this 22th day of December, 1995, to the following:

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