

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish nondiscriminatory rates,) Docket No. 950985-TP
terms, and conditions for)
interconnection involving local) (Sprint Phase)
exchange companies and alternative)
local exchange companies pursuant to) Filed: January 26, 1996
Section 364.162, Florida Statutes.)
_____)

MCI METRO ACCESS TRANSMISSION SERVICES, INC.'S
PREHEARING STATEMENT

MCI Metro Access Transmission Services, Inc. (MCImetro) hereby submits its Prehearing Statement in the phase of the above-captioned docket relating to petitions filed against Sprint-United and Sprint-Centel (Sprint).

A. Known Witnesses. MCImetro has prefiled the testimony of the following witnesses:

<u>Witness</u>	<u>Testimony</u>	<u>Issues</u>
Dr. Nina Cornell	Rebuttal	1-3, 11

MCImetro reserves the right to file additional testimony (and accompanying exhibits) with respect to the petitions recently filed by MFS, on whatever timetable is established by the Commission for such filings.

B. Known Exhibits. MCImetro has the following direct exhibits. MCImetro reserves the right to use additional exhibits for the purpose of cross-examination.

Cornell Rebuttal	NWC-1	Academic and Professional Qualifications of Dr. Nina Cornell
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C. Basic Position. The appropriate arrangement for the exchange of local traffic between Sprint and any ALEC is mutual traffic exchange in which the parties have co-carrier status and compensate each other "in kind" by terminating local traffic from the other party without explicit compensation. The appropriate arrangement for the exchange of toll traffic between Sprint and any ALEC is the payment of terminating access charges by the carrier originating the traffic to the carrier terminating the traffic. All arrangements for termination of local traffic and other related matters should be tariffed. However, the tariffing of a specific arrangement negotiated by one set of parties should not preclude the tariffing of other arrangements that may be negotiated by other parties nor should it set a precedent for Commission action in the event another set of parties is unable to reach a negotiated agreement and petitions the Commission to resolve their dispute.

D-F. Issues. MCImetro's positions on the issues identified by the parties at the informal issue identification meeting are as follows:

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

MCImetro: The appropriate arrangement for exchange of local traffic between the ALECs and Sprint is mutual traffic exchange in which the parties have co-carrier status and compensate each other "in kind" by terminating traffic from the other party without cash compensation. The appropriate basis for exchange of toll traffic is for the company originating the traffic to pay terminating access charges to the company terminating

the traffic. The ALECs should be permitted to establish switched access charge rates by tariff or price list using a rate structure of their choosing, subject only to the limitation that any ALEC's total price for terminating an interexchange call does not exceed the price that would be charged by Sprint for terminating an interexchange call.

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

MCImetro: Yes, interconnection rates or other arrangements established by the Commission should be tariffed and should be available on a non-discriminatory basis to all parties similarly situated.

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

MCImetro: For local traffic originated to or terminated from other carriers through Sprint's network, Sprint should be required to provide the transit function to ALECs at a price equal to its direct economic cost (i.e. TSLRIC). For toll traffic originated to or terminated from other carriers through Sprint's network, Sprint should be required to provide the transit function to ALECs on the same basis that this function is provided to other LECs.

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 Sprint?

MCImetro: The appropriate financial arrangement for exchange of intraLATA 800 traffic is for the company terminating the traffic to pay terminating access charges to the company originating the traffic and for the company originating the traffic to pay originating access charges to the company terminating the traffic. The ALEC should be permitted to utilize Sprint's tariffed

800 access features at nondiscriminatory, tariffed rates. The appropriate technical requirements are for the carrier receiving the traffic to designate how traffic is segregated (e.g., local vs. toll). Trunking and signalling that complies with industry standards should be provided for intraLATA 800 traffic, including CCS7 signalling on all trunk types that support it.

Issue 5a. What are the appropriate technical arrangements for the interconnection of the respective ALECs' network to Sprint's 911 provisioning network such that respective ALECs' customers are ensured the same level of 911 service as they would receive as a customer of Sprint?

MCImetro: Sprint should be required to make trunking and network arrangements available so that an ALEC can route 911 calls through the existing 911 network. Such arrangements should be equal in type and quality to the arrangements Sprint provides to itself. Sprint should be required to provide the ALEC with advance notification of any scheduled testing on or maintenance of the 911 network and immediate notification of any unscheduled outage of the 911 network.

Issue 5b. What procedures should be in place for the timely exchange and updating of the respective ALECs' customer information for inclusion in appropriate E911 databases?

MCImetro: Sprint should be required to provide ALECs with access to the "master street address guide" that is used to ensure that address information is in the correct format for inclusion in the 911 Automatic Location Identification (ALI) database. Sprint should be required to provide ALECs with the ability to make mechanized entries into the ALI database(s).

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

MCImetro: Sprint should be required to provide trunking and signalling that complies with industry standards for operator services, and should institute the procedures necessary to allow ALEC operators to perform busy line verification and operator interrupt for customers on Sprint's network. Sprint should provide operator

services to ALECs on the same rates, terms, and conditions that such functions are made available to other LECs.

Issue 7. What are the appropriate arrangements for the provision of directory assistance services and data between the respective ALECs and Sprint?

MCImetro: Sprint should be required to list ALECs' customers in its directory assistance data bases at no charge and in exchange ALECs should provide Sprint with the necessary customer information at no charge. Sprint should be required to offer ALECs three options to support the ALECs' provision of directory assistance, including resale of Sprint's DA service, access to Sprint's database, and sale of Sprint's database to the ALECs.

Issue 8. Under what terms and conditions should Sprint be required to list the respective ALEC's customers in its white and yellow pages directories and to publish and distribute these directories to the respective ALECs' customers?

MCImetro: Sprint should be required to list ALECs' customers in its white pages, and provide a plain business listing in its yellow pages, at no charge. In exchange, ALECs should provide their customer listings to Sprint at no charge. Sprint should distribute the complete white page and yellow page directories to ALECs' customers at no charge at the same time directories are distributed to its own customers. Sprint should include information on ALECs' services in the "informational" section of the white pages directory.

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

MCImetro: Sprint should provide ALECs with access to the line information database in order to validate calls placed to Sprint customers using third-party billed, collect, and credit card calls. Sprint should be required to treat ALECs like any other LEC in the billing and clearing of fund transfers for credit card, collect calls, third-party and audiotext calls when the end user billed for the call is Sprint's customer.

Issue 10. What arrangements are necessary to ensure the provision of CLASS/LASS services between the respective ALECs and Sprint's networks?

MCImetro: Sprint should deliver to ALECs, without limitation or modification, any and all CCS7 signalling information generated by the caller or by Sprint on behalf of the caller.

Issue 11. What are the appropriate arrangements for physical interconnection between the respective ALECs and Sprint, including trunking and signalling arrangements?

MCImetro: ALECs should be permitted to designate one point of interconnection (POI) in each local calling area. ALECs should have the option to establish the POI via collocation, mid-span meet, or an entrance arrangement. Each carrier should be responsible for providing its own facilities to route calls to and from the POI. If a mid-span meet or entrance arrangement is used, no collocation charges should apply to facilities provided to the POI. ALECs should have the option to use either one-way or two-way trunks. The carrier receiving the traffic should be entitled to designate how traffic is segregated (e.g. local vs. toll). Sprint should provide ALECs with common channel signalling on all trunk types that support CCS7 signalling. Trunking and signalling that complies with industry standards should be provided for directory assistance, local, interLATA toll, intraLATA toll, operator services, and 911/E911.

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?

MCImetro: Since the ALEC is the carrier terminating the call, it is entitled to the terminating access charges. Any such charges collected by Sprint with respect to such a call should be remitted to the ALEC. Unless requested otherwise by the ALEC, Sprint should deliver traffic terminating to a number that has been "ported" to the ALEC to the ALEC's point of interconnection.

Issue 13. What arrangements, if any, are necessary to address other operational issues?

MCImetro: Sprint must develop and offer mechanized intercompany procedures to support the ordering by ALECs of unbundled loops, interoffice facilities (POI arrangements and trunks), interim number portability mechanisms, customer listing databases, and any other service or function necessary for the interoperability of Sprint's and the ALEC's networks. Sprint must also develop mechanized intercompany procedures to support repair services, including referral of trouble tickets, trouble isolation in interconnection facilities, and trouble isolation on unbundled facilities.

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

MCImetro: Until the NXX code administration function is moved to a neutral third party administrator, Sprint should be required to provide nondiscriminatory NXX assignments to ALECs on the same basis that such assignments are made to other LECs, including Sprint.

H. Stipulations. MCImetro is not aware of any stipulations in this phase of the docket.

I. Pending Motions. MCImetro has no pending motions that require action by the Commission.

J. Requirements of Order. MCImetro believes this prehearing statement is fully responsive to the requirements of the Order on Prehearing Procedure.

RESPECTFULLY SUBMITTED this 26th day of January, 1996.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by hand delivery (**) or next business day delivery by UPS (*) this 26th day of January, 1996.

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