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June 20, 1997

Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket Nos. 960847-TP and 960980-TP
Petitions by AT&T Communications of the Southern States, Inc.,
MCI Telecommunications Corporation and MCI Metro Access
Transmission Services, Inc. for arbitration of certain terms and conditions
of a proposed agreement with GTE Florida Incorporated concerning
interconnection and resale under the Telecommunications Act of 1996

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of GTE Florida
Incorporated's Amendment to Request for Extension to File AIN Capabilities Cost Study
in the above matter. Service has been made as indicated on the Certificate of Service.
If there are any questions regarding this filing, please contact me at (813) 483-2617.

Very truly yours,

Kimberly Caswell
Kimberly Caswell

KC:tas
Enclosures

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU 2
- CTR _____
- EAG _____
- LEG 2
- LIN 5
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

RECEIVED & FILED

[Signature]
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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

A part of GTE Corporation

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petitions by AT&T Communications)	Docket No. 960847-TP
of the Southern States, Inc., MCI)	Docket No. 960980-TP
Telecommunications Corporation and MCI)	Filed: June 20, 1997
Metro Access Transmission Services, Inc.)	
for arbitration of certain terms and conditions)	
of a proposed agreement with GTE Florida)	
Incorporated concerning interconnection and)	
resale under the Telecommunications Act)	
of 1996)	

**AMENDMENT TO GTE FLORIDA INCORPORATED'S REQUEST
FOR EXTENSION TO FILE AIN CAPABILITIES COST STUDY**

On March 6, 1997, GTE Florida Incorporated (GTEFL) filed its Request for Extension to File AIN Capabilities Cost Study (Request). The study was required by the Commission's Order number PSC-97-0064-FOF-TP in this docket. It was originally due on March 18, 1997. In its Request, GTEFL asked for a 90-day extension, until June 18, 1997, to file the study. The Commission has not yet acted on GTEFL's Request.

Completing the AIN cost study has been even more difficult and time-consuming than GTE contemplated, for the same reasons GTEFL set forth in its original Request (a copy of which is attached). As such, GTEFL is compelled to ask for an additional 30-day period of extension, until July 18, 1997.

GTE emphasizes that this extension will not prejudice any party's ability to obtain interconnection or resale arrangements under this docket. Indeed, GTEFL has already executed interconnection and resale contracts with MCI and AT&T, as required by the Commission. The GTEFL/MCI contract has already been approved, and approval of the GTEFL/AT&T contract is expected next week. Lack of an AIN cost study was not a barrier

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to contract execution or approval because neither MCI or AT&T apparently plans to use the "AIN capabilities" at issue in the immediate future. As such, this amended request for extension, if granted, will not affect the Commission's mission to foster competition.

For these reasons, and all of the reasons set forth in GTEFL's original Request for Extension, GTEFL asks the Commission to grant GTEFL an additional extension of time, until July 18, 1997, to file its AIN cost study.

Respectfully submitted on June 20, 1997.

By:



Anthony P. Gillman

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Attorneys for GTE Florida Incorporated

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T Communications)	Docket No. 960847-TP
of the Southern States, Inc., MCI)	Docket No. 960980-TP
Telecommunications Corporation and MCI)	Filed: March 6, 1997
Metro Access Transmission Services, Inc.,)	
for arbitration of certain terms and)	
conditions of a proposed agreement with)	
GTE Florida Incorporated concerning)	
interconnection and resale under the)	
Telecommunications Act of 1996)	
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**GTE FLORIDA INCORPORATED'S REQUEST FOR
EXTENSION TO FILE AIN CAPABILITIES COST STUDY**

In its Order number PSC-97-0064-FOF-TP (Order) in this docket, the Commission directed GTE Florida Incorporated (GTEFL) to file total service long-run incremental cost studies for a number of network elements not covered by the cost studies GTEFL submitted at the beginning of this arbitration. Among those elements, the Commission listed "AIN capabilities." These cost studies are due on March 18, 1997. (Order at 34.) For the reasons discussed below, GTEFL asks the Commission for a 90-day extension within which to file the AIN cost study.

First, it has been difficult for GTEFL to determine what the AIN cost study should include. Because the term "AIN capabilities" is not specific enough to design a meaningful and relevant study, there has necessarily been some delay in discerning the proper scope of the cost analysis. Commission Staff has advised GTEFL that the study should include the AIN capabilities AT&T has requested, but neither AT&T nor MCI have described in sufficient detail the capabilities they seek.

Also, because AIN allows development of new services, the AIN cost could vary substantially depending upon the new service. This creates additional challenges in identifying cost components and in structuring cost studies which capture the variables. Nevertheless, GTEFL is evaluating methods to access AIN and is defining the certification and testing programs for carriers that request such access.

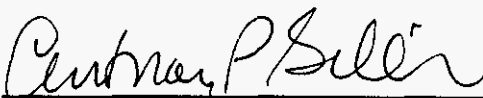
Second, GTEFL has discovered some problems in its existing cost data for AIN features. GTEFL had planned to build the Commission-required study from these inputs, but they will need to be revised substantially to produce an accurate study. Because of the many other cost studies GTE must do in connection with arbitration proceedings in Florida and numerous other states, GTE's personnel and other resources continue to be severely taxed. The unexpected problems with the AIN cost inputs have made this already bad resource situation even worse, so that GTEFL cannot realistically complete a thorough and reliable study within the Order's time frame.

Third, no party will be prejudiced by the Commission's granting the extension GTEFL has requested. Pursuant to the Order, GTEFL has already submitted for approval its interconnection and unbundling contracts with AT&T and MCI, respectively. The contract with AT&T contained no issues regarding AIN capabilities. In MCI's contract, Appendix C does list AIN capabilities, but with rates TBD ("to be determined"), contemplating that the study would not be done before the contract was approved. Furthermore, the contract does not define AIN capabilities. For these reasons, lack of the AIN cost study will have no effect on the ability of the Commission to approve the contracts or the ability of MCI and AT&T to operate under them. Because it appears that neither

AT&T nor MCI will be using the "AIN capabilities" in the immediate future, a 90-day delay in completing the AIN cost study will in no way undermine this Commission's mission to foster competition.

For all the reasons discussed in this filing, GTEFL asks the Commission to grant it a 90-day extension to complete the AIN capabilities cost study required in the Order.

Respectfully submitted on March 6, 1997.

By: 

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Attorneys for GTE Florida Incorporated


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Amendment to GTE Florida Incorporated's Request for Extension to File AIN Capabilities Cost Study in Docket Nos. 960847-TP and 960980-TP was sent via U.S. mail on June 20, 1997 to the parties listed below.

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