

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Intrado Communications, Inc. for arbitration of certain rates, terms, and conditions for interconnection and related arrangements with Embarq Florida, Inc., pursuant to Section 252(b) of the Communications Act of 1934, as amended, and Section 364.162, F.S.

DOCKET NO. 070699-TP

DATED: JUNE 3, 2008

RECEIVED FPSC  
08 JUN -3 PM 3:33  
COMMISSION  
CLERK

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-08-0172-PCO-TP, issued March 21, 2008, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

None.

b. All Known Exhibits

None.

c. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

d. Staff's Position on the Issues

EMP \_\_\_\_\_ **ISSUE 1(A): WHAT SERVICE(S) DOES INTRADO CURRENTLY PROVIDE OR**  
COM \_\_\_\_\_ **INTENDS TO PROVIDE IN FLORIDA?**

CTR \_\_\_\_\_ **STAFF:** Staff has no position at this time.

FOR \_\_\_\_\_ **ISSUE 1(B): OF THE SERVICES IDENTIFIED IN (A), FOR WHICH, IF ANY, IS**  
CCL \_\_\_\_\_ **EMBARQ REQUIRED TO OFFER INTERCONNECTION UNDER**  
OFC \_\_\_\_\_ **SECTION 251(C) OF THE TELECOMMUNICATIONS ACT OF 1996?**

ROA \_\_\_\_\_ **STAFF:** Staff has no position at this time.

FOR \_\_\_\_\_ **ISSUE 1(C): OF THE SERVICES IDENTIFIED IN (A), FOR WHICH, IF ANY,**  
CCL \_\_\_\_\_ **SHOULD RATES APPEAR IN THE ICA?**

CEC \_\_\_\_\_  
CCL \_\_\_\_\_

DOCUMENT NUMBER-DATE

04725 JUN-3 8

FPSC-COMMISSION CLERK

**STAFF:** Staff has no position at this time.

**ISSUE 1(D):** FOR THOSE SERVICES IDENTIFIED IN 1(C), WHAT ARE THE APPROPRIATE RATES?

**STAFF:** Staff has no position at this time.

**ISSUE 2(A):** WHAT TRUNKING AND TRAFFIC ROUTING ARRANGEMENTS SHOULD BE USED FOR THE EXCHANGE OF TRAFFIC WHEN INTRADO IS THE DESIGNATED 911/E911 SERVICE PROVIDER?

**STAFF:** Staff has no position at this time.

**ISSUE 2(B):** WHAT TRUNKING AND TRAFFIC ROUTING ARRANGEMENTS SHOULD BE USED FOR THE EXCHANGE OF TRAFFIC WHEN EMBARQ IS THE DESIGNATED 911/E911 SERVICE PROVIDER?

**STAFF:** Staff has no position at this time.

**ISSUE 3:** WHAT TERMS AND CONDITIONS SHOULD GOVERN POINTS OF INTERCONNECTION (POIS) WHEN:

(A): INTRADO IS THE DESIGNATED 911/E911 SERVICE PROVIDER?

(B): EMBARQ IS THE DESIGNATED 911/E911 SERVICE PROVIDER?

**STAFF:** Staff has no position at this time.

**ISSUE 4(A):** SHOULD SPECIFIC TERMS AND CONDITIONS BE INCLUDED IN THE ICA FOR INTER-SELECTIVE ROUTER TRUNKING? IF SO, WHAT ARE THE APPROPRIATE TERMS AND CONDITIONS?

**STAFF:** Staff has no position at this time.

**ISSUE 4(B):** SHOULD SPECIFIC TERMS AND CONDITIONS BE INCLUDED IN THE ICA TO SUPPORT PSAP-TO-PSAP CALL TRANSFER WITH AUTOMATIC LOCATION INFORMATION ("ALI")? IF SO, WHAT ARE THE APPROPRIATE TERMS AND CONDITIONS?

**STAFF:** Staff has no position at this time.

**ISSUE 5:** SHOULD THE INTERCONNECTION AGREEMENT INCLUDE THE TERMS AND CONDITIONS UNDER WHICH EMBARQ ORDERS SERVICES FROM INTRADO? IF SO, WHAT ARE THE APPROPRIATE TERMS AND CONDITIONS?

**STAFF:** Staff has no position at this time.

**ISSUE 6(B):** WHAT TERMS AND CONDITIONS SHOULD BE INCLUDED IN THE ICA TO ADDRESS ACCESS TO 911/E911 DATABASE INFORMATION WHEN INTRADO IS THE DESIGNATED 911/R911 SERVICE PROVIDER?

**STAFF:** Staff has no position at this time.

**ISSUE 7:** SHOULD 911/E911 SERVICE CALLS BE INCLUDED IN THE TYPE OF TRAFFIC TO BE EXCHANGED BY THE PARTIES OVER LOCAL INTERCONNECTION TRUNKS?

**STAFF:** Staff has no position at this time.

**ISSUE 11:** HOW SHOULD THE TERM "END USER" BE DEFINED AND WHERE SHOULD IT BE USED IN THE ICA?

**STAFF:** Staff has no position at this time.

**ISSUE 13:** SHOULD THE TERM "DESIGNATED" OR THE TERM "PRIMARY" BE USED TO INDICATE WHICH PARTY IS SERVING THE 911 AUTHORITY?

**STAFF:** Staff has no position at this time.

**ISSUE 14:** WHAT ARE THE APPROPRIATE TERMS AND CONDITIONS REGARDING AUDITS?

**STAFF:** Staff has no position at this time.

e. Pending Motions

Staff has no pending motions.

f. Pending Confidentiality Claims or Requests

Staff has no pending confidentiality claims or requests.

g. Compliance with Order No. PSC-08-0172-PCO-TP

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 3<sup>rd</sup> day of June, 2008.



---

LEE ENG TAN  
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
(850) 413-6199

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Intrado Communications, Inc. for arbitration of certain rates, terms, and conditions for interconnection and related arrangements with Embarq Florida, Inc., pursuant to Section 252(b) of the Communications Act of 1934, as amended, and Section 364.162, F.S.

DOCKET NO. 070699-TP

DATED: JUNE 3, 2008

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and five correct copies of COMMISSION STAFF'S PREHEARING STATEMENT has been filed with Office of Commission Clerk and one copy has been furnished to the following by U. S. mail this 3<sup>rd</sup> day of June, 2008:


Cahill Law Firm  
Chérie R. Kiser/Angela F. Collins  
1990 K Street N.W., Suite 950  
Washington DC 20006

Embarq  
Susan S. Masterton  
Mailstop: FLTLHO0102  
1313 Blair Stone Road  
Tallahassee, Florida 32301

Embarq Florida, Inc.  
Ms. Sandra A. Khazraee  
Mail code: FLTLHO0201  
P. O. Box 2214  
Tallahassee, Florida 32316-2214

Intrado Communications Inc.  
Rebecca Ballesteros  
1601 Dry Creek Drive  
Longmont, Colorado 80503

Messer Law Firm  
Floyd Self  
2618 Centennial Place  
Tallahassee, Florida 32308

  
\_\_\_\_\_  
LEE ENG TAN  
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
(850) 413-6199

DOCUMENT NO.      DATE  
04725-08 06/03/08  
FPRC - COMMISSION CLERK