

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition for arbitration of certain terms and conditions of an interconnection agreement with Verizon Florida, LLC by Bright House Networks Information Services (Florida), LLC. | DOCKET NO. 090501-TP  
ORDER NO.  
ISSUED:

COMMISSION  
CLERK

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-10-0081-PCO-TP, issued February 12, 2010, 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

**ISSUE 1: SHOULD TARIFFED RATES AND ASSOCIATED TERMS APPLY TO SERVICES ORDERED UNDER OR PROVIDED IN ACCORDANCE WITH THE INTERCONNECTION AGREEMENT ("ICA")?**

Position: Staff has no position at this time.

**ISSUE 2: SHOULD ALL CHARGES UNDER THE ICA BE EXPRESSLY STATED? IF NOT, WHAT PAYMENT OBLIGATIONS ARISE WHEN A PARTY RENDERS A SERVICE TO THE OTHER PARTY FOR WHICH THE ICA DOES NOT SPECIFY A PARTICULAR RATE?**

Position: Staff has no position at this time.

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**ISSUE 7: SHOULD VERIZON BE ALLOWED TO CEASE PERFORMING DUTIES PROVIDED FOR IN THIS AGREEMENT THAT ARE NOT REQUIRED BY APPLICABLE LAW?**

Position: Staff has no position at this time.

**ISSUE 13: WHAT TIME LIMITS SHOULD APPLY TO THE PARTIES' RIGHT TO BILL FOR SERVICES AND DISPUTE CHARGES FOR BILLED SERVICES?**

Position: Staff has no position at this time.

**ISSUE 16: SHOULD BRIGHT HOUSE BE REQUIRED TO PROVIDE ASSURANCE OF PAYMENT? IF SO, UNDER WHAT CIRCUMSTANCES, AND WHAT REMEDIES ARE AVAILABLE TO VERIZON IF ASSURANCE OF PAYMENT IS NOT FORTHCOMING?**

Position: Staff has no position at this time.

**ISSUE 24: IS VERIZON OBLIGED TO PROVIDE FACILITIES FROM BRIGHT HOUSE'S NETWORK TO THE POINT OF INTERCONNECTION AT TOTAL ELEMENT LONG RUN INCREMENTAL COST ("TELRIC") RATES?**

Position: Staff has no position at this time.

**ISSUE 32: MAY BRIGHT HOUSE REQUIRE VERIZON TO ACCEPT TRUNKING AT DS-3 LEVEL OR ABOVE?**

Position: Staff has no position at this time.

**ISSUE 36: WHAT TERMS SHOULD APPLY TO MEET-POINT BILLING, INCLUDING BRIGHT HOUSE'S PROVISION OF TANDEM FUNCTIONALITY FOR EXCHANGE ACCESS SERVICES?**

**(A) SHOULD BRIGHT HOUSE REMAIN FINANCIALLY RESPONSIBLE FOR THE TRAFFIC OF ITS AFFILIATES OR OTHER THIRD PARTIES WHEN IT DELIVERS THAT TRAFFIC FOR TERMINATION BY VERIZON?**

**(B) TO WHAT EXTENT, IF ANY, SHOULD THE ICA REQUIRE BRIGHT HOUSE TO PAY VERIZON FOR VERIZON-PROVIDED FACILITIES USED TO CARRY TRAFFIC BETWEEN INTEREXCHANGE CARRIERS AND BRIGHT HOUSE'S NETWORK?**

Position: Staff has no position at this time.

**ISSUE 37: HOW SHOULD THE TYPES OF TRAFFIC (E.G. LOCAL, ISP, ACCESS) THAT ARE EXCHANGED BE DEFINED AND WHAT RATES SHOULD APPLY?**

Position: Staff has no position at this time.

**ISSUE 41: SHOULD THE ICA CONTAIN SPECIFIC PROCEDURES TO GOVERN THE PROCESS OF TRANSFERRING A CUSTOMER BETWEEN THE PARTIES AND THE PROCESS OF LOCAL NUMBER PORTABILITY (“LNP”) PROVISIONING? IF SO, WHAT SHOULD THOSE PROCEDURES BE?**

Position: Staff has no position at this time.

**ISSUE 49: ARE SPECIAL ACCESS CIRCUITS THAT VERIZON SELLS TO END USERS AT RETAIL SUBJECT TO RESALE AT A DISCOUNTED RATE?**

Position: Staff has no position at this time.

e. Pending Motions

Staff has no pending motions.

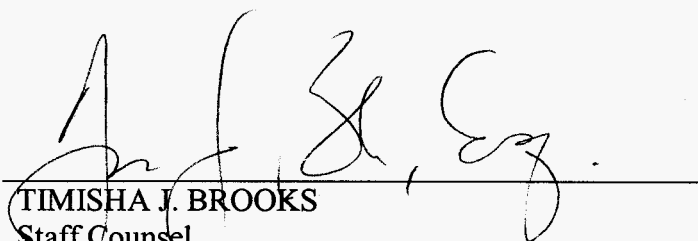
f. Pending Confidentiality Claims or Requests

Verizon Florida LLC’s Request for Confidential Classification and Motion for Protective Order [of DN 02972-10] (filed April 16, 2010).

g. Compliance with Order No. PSC-10-0081-PCO-TP

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

Respectfully submitted this 30<sup>th</sup> day of April, 2010.



TIMISHA J. BROOKS  
Staff Counsel

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with Verizon Florida, LLC by Bright House  
Networks Information Services (Florida), LLC.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of COMMISSION STAFF'S PREHEARING STATEMENT has been filed with Office of Commission Clerk and one copy has been furnished to the following by electronic and U. S. mail this 30<sup>th</sup> day of April, 2010:

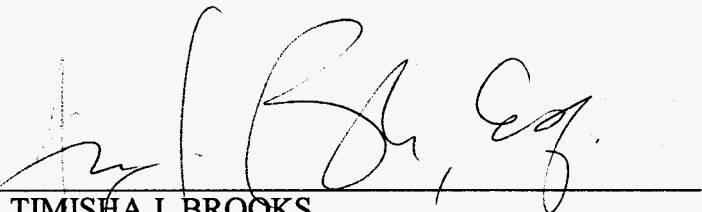
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