State of Florida



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE: March 23, 1993

TO: All Interested Parties

FROM: Charles W. Murphy, Staff Counsel, Division of Legal Services

RE: Expanded Interconnection Workshop - Docket No. 9210 TP

The staff of the Florida Public Service Commission will conduct a workshop regarding Expanded Interconnection, Docket No.

9:30 a.m., Thursday, April 8, 1993 Room 122, Fletcher Building 101 East Gaines Street Tallahassee, FL 32399-0863

The purpose of this workshop, and others to follow, will be to educate staff on the FCC's recent order on expanded interconnection and for parties to present their views on interconnection and collocation in an informal setting. As a result of these workshops, staff hopes that many of the issues regarding collocation can be stipulated.

There are many questions yet unanswered regarding expanded interconnection that staff would like to see addressed informally during the first workshop on April 8, 1993. Staff invites all interested parties to give a thirty (30) minute presentation on their views regarding the potential benefits and effects of expanded interconnection. Parties should be prepared to discuss the implications of expanded interconnection for both special access/private line and switched access. Staff recognizes that the current Florida law does not permit switching, but we believe that it may be appropriate to address switching in this docket. Parties' presentations should address the following questions and any other issues they believe are important.

ACK _	1.	What are the pros and cons of expanded interconnection?
AFA	2.	What does expanded interconnection mean and how will it benefit interconnectors and end users? Discuss for both special access and switched. Please provide diagrams.
APP		
CAF		What impact does the FCC's order have on Florida?
CMU	3.	
CTR	4.	Does the FCC's order force the Commission to adopt the same requirements and actions ordered for interstate special access?
EAG		
LEG	5.	Will expanded interconnection benefit the state of Florida, and if so, why?
OPC	6.	Should the Commission address expanded interconnection for switched access or limit this proceeding to private line and special access? Why or why not?
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- 7. Will expanded interconnection for special access and private line impact local rates? If so, how? Will expanded interconnection for switched access impact local rates? If so, how?
- 8. What types of services do interconnectors plan to provide and how?
- What effect will the adoption of a particular interconnection architecture have on the LEC and the collocator? Discuss the effects of physical vs. virtual collocation.

Following the presentations, there will be a round table discussion concerning the FCC's recent order on expanded interconnection for special access and the notice of proposed rulemaking for switched access interconnection. Staff encourages all parties to actively participate during the round table discussion. Staff is generally familiar with the order, but we are looking for an explanation of those items which are either not clear or which are not appropriate. For example, does the FPSC have to adopt, or should we adopt, the same requirements outlined in the FCC's order? Staff requests that the parties be prepared to discuss the following areas:

- Physical vs. Virtual Collocation. How does the FCC define physical and virtual location?
- 2. What type of interconnection architecture should the Commission adopt? It should be noted that the FPSC filed a petition to waive the requirement that Florida Tier 1 LECs file interstate special access tariffs for physical collocation until after the Commission has ruled in this docket. This was also done by several other states that could not meet the FCC's February 19, 1992 deadline. We also recognize that if the Commission's petition is denied then the interconnection architecture will be physical collocation.
- 3. What should and should not be tariffed by the LEC?
- 4. Should LECs be granted pricing flexibility? Why or why not?
- 5. Should the LEC's pricing flexibility for intrastate be the same as that given to the LECs on interstate special access?
- 6. Who should provide expanded interconnection? Should it be limited to Tier 1 LECs as the FCC ordered?
- 7. Who should be able to interconnect?

- 8. Should the LECs make expanded interconnection available in all COs? If yes, why? If no, why not?
- 9. Should all special access providers be required to file tariffs the same way that the LECs do today? If not, why not?
- 10. If interconnectors are not required to file tariffs, should the LECs continue filing tariffs for these type services?
- Should the LECs be allowed to tariff a contribution charge to be paid by collocators interconnecting to the LEC network? If yes, what should it be and why? If no, why not?
- 12. What should be the standards for interconnection?
- 13. What should be the interconnection point and why?
- 14. What should be the entry points and why?
- 15. What should be the rate structure?
- 16. Should the LECs be required to unbundle? If yes, what? If no, why not?
- 17. What type of equipment should be permitted in the CO?
- 18. Should the Commission allow expanded interconnection for non-fiber optic technology? If so why?
- 19. Should interconnectors be required to allow LECs and other parties to interconnect with their networks?
- Any other issues that parties believe need to be discussed.

Remember, the purpose of this first workshop is to educate *aff and have parties present their views on expanded interconnection in an informal format. It is not designed to adopt any particular position or course of action by this Commission. Staff requests that all parties who plan to give a presentation and/or participate during the round table notify Mike Reith by April 2 so that staff will be able to put together an agenda prior to the meeting. Please be prepared to provide all parties with an outline of your presentation at the workshop. Also, whenever possible please use diagrams.

Memorandum to All Interested Persons Docket No. 921074-TP Page 4

We recognize that these issues are very complex and we do not wish to cut anyone short. If you believe that 30 minutes is not enough time to adequately present your views, please notify us as soon as possible and give us an estimate of how long your presentation will last. Depending on the number of parties who plan to participate, we may be able to extend the time limit. At the conclusion of the presentations, we will discuss how we should proceed with this docket. If you have any questions please contact Mike Reith or Tom McCabe at (904) 488-1280.

CWM/ttl

cc: Division of Communications (Reith)