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July 13, 1993

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Mr. Steven C. Tribble, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399

Re: Docket No. 921074-TP

Dear Mr. Tribble:

Enclosed for filing in the above referenced docket are one (1) original and fifteen (15) copies of the Interexchange Access Coalition's Prehearing Statement. Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Yours truly,



Brad E. Mutschelknaus

BEM/ean  
Enclosures

cc: Parties of Record

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Intermedia )  
Communications of Florida, Inc. )  
for expanded interconnection ) Docket No. 921074-TP  
for AAVs within LEC central )  
offices )  

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**INTEREXCHANGE ACCESS**  
**COALITION'S PREHEARING STATEMENT**

The Interexchange Access Coalition (IAC), through its undersigned counsel, files its Prehearing Statement, pursuant to Order No. PSC-93-0811-PCO-TP. Due to a misunderstanding by IAC, this Prehearing Statement is being filed one week late. IAC respectfully seeks leave of the Commission to make this late filing. IAC submits that no party will be prejudiced by acceptance of this filing, since IAC does not presently intend to participate actively in Phase I of this proceeding. As described in part C below, IAC's interest is limited to the switched access interconnection issues which have been deferred to Phase II of the proceeding.

**A. WITNESSES:**

None.

**B. EXHIBITS:**

None.

**C. STATEMENT OF BASIC POSITION:**

IAC's Statement of Basic Position:

IAC's interest in this proceeding is limited to issues relating to switched access interconnection. Accordingly, IAC's

active involvement is likely to be limited to Phase II of this docket. IAC takes no position at this time regarding most of the issues raised in Phase I.

D. E. F. ISSUES AND POSITIONS:

**ISSUE 1:** Is expanded interconnection for special access and/or private line in the Public Interest?

FIXCA: No position at this time.

**ISSUE 2:** How does the FCC's order on expanded interconnection impact the Commission's ability to impose forms and conditions of expanded interconnection that are different from those imposed by the FCC's order?

FIXCA: No position at this time.

**ISSUE 3:** Under what circumstances should the Commission impose different forms and conditions of expanded interconnection?

FIXCA: No position at this time.

**ISSUE 4:** Does Chapter 364 Florida Statutes allow the Commission to require expanded interconnection?

FIXCA: No position at this time.

**ISSUE 5:** Does a physical collocation mandate raise federal and/or state constitutional questions about the taking or confiscation of LEC property?

FIXCA: No position at this time.

**ISSUE 6:** Should the Commission require physical and/or virtual collocation?

FIXCA: No position at this time.

**ISSUE 7:** What LECs, if any, should be required to provide expanded interconnection?

FIXCA: No position at this time.

**ISSUE 8:** Where should expanded interconnection be offered?

FIXCA: No position at this time.

**ISSUE 9:** Who should be allowed to interconnect?

**FIXCA:** No position at this time.

**ISSUE 10:** Should the same terms and conditions of expanded interconnection apply to AT&T as apply to other interconnectors?

**FIXCA:** No position at this time.

**ISSUE 11:** Should the Commission require standards for physical and/or virtual collocation? If so, what should they be?

**FIXCA:** No position at this time.

**ISSUE 12:** Should collocators be required to allow LECs and other parties to interconnect with their networks?

**FIXCA:** No position at this time.

**ISSUE 13:** What standards should be established for the LECs to allocate space for collocators?

**FIXCA:** No position at this time.

**ISSUE 14:** Should the Commission allow expanded interconnection for non-fiber optic technology?

**FIXCA:** No position at this time.

**ISSUE 15:** If the Commission permits expanded interconnection, what pricing flexibility should the LECs be granted for special access and private line services?

**FIXCA:** Expanded interconnection for special access and private line service per se, does not justify granting the LECs any additional pricing flexibility. The Commission should separately consider, however, whether zone pricing based on identifiable cost differences in service is a reasonable pricing strategy for LEC-provided special access and private line services.

**ISSUE 16:** If the Commission permits collocation, what rates, terms, and conditions should be tariffed by the LEC?

**FIXCA:** No position at this time.

**ISSUE 17:** Should all special access and private line providers be required to file tariffs?

**FIXCA:** Yes. The Commission should require that all access providers tariff their services so that it may guard against discrimination in this market. The requirement is particularly critical with respect to switched access

services where any discrimination between access customers -- i.e., the interexchange carriers -- will seriously disrupt interexchange competition.

**ISSUE 18:** What separations impact will expanded interconnection have on the LECs?

**FIXCA:** No position at this time.

**ISSUE 19:** How would ratepayers be financially affected by expanded interconnection?

**FIXCA:** No position at this time.

**ISSUE 20:** Should the Commission grant ICI's petition?

**FIXCA:** No position at this time.

**ISSUE 21:** Should expanded interconnection be subject to a "net revenue test" requirement in order to avoid possible cross-subsidy concerns?

**FIXCA:** No position at this time.

**G. STIPULATED ISSUES:**

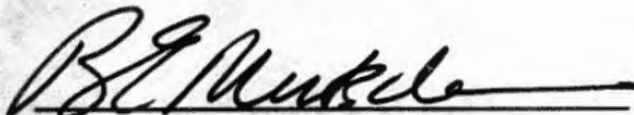
None.

**H. PENDING MOTIONS AND OTHER MATTERS:**

IAC has no pending motions.

**I. REQUIREMENTS WHICH CANNOT BE COMPLIED WITH:**

None.



Brad E. Mutschelknaus  
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Attorney for the Interexchange  
Access Coalition

July 14, 1993

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the Interexchange Access Coalitions' Prehearing Statement has been furnished by hand delivery\* or by U.S. Mail to the following parties of record, this 14th day of July, 1993:

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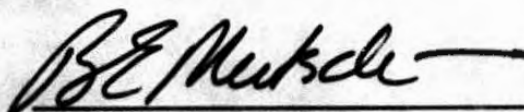
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Brad E. Mutschelknaus

State of Florida

Commissioners:

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THOMAS M. BEARD  
SUSAN F. CLARK  
LUIS J. LAUREDO  
JULIA L. JOHNSON



DIVISION OF RECORDS &  
REPORTING  
STEVE TRIBBLE  
DIRECTOR  
(904) 488-8371

**Public Service Commission**

July 14, 1993

Brad E. Mutschelknaus, Esquire  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

Re: Filing of Diskettes

Dear Mr. Mutschelknaus:

Enclosed is a copy of Rule 25-22.028, F.A.C., Filing, Service of Documents, and Computation of Time, which became effective February 11, 1992. The rule requires, in part, that documents filed by certain entities (as specified in the rule) also be filed on diskette in word processing or spreadsheet format. My office received a document from you on July 14, 1993, entitled "Prehearing Statement" in Docket 921074-TP, which should have been filed on diskette as well as in paper form. Please forward a diskette copy of the document at your earliest convenience.

If you have any questions regarding this matter, please call JoAnne Jackson or Kay Flynn at (904) 488-8371.

Sincerely,

A handwritten signature in cursive script that reads "Kay Flynn for".

Steve Tribble, Director  
Records and Reporting

ST:jj  
Enclosure