

316
ORIGINAL
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition(s)
to Establish Nondiscriminatory
Rates, Terms, and Conditions
Interconnection Involving Local
Exchange Companies and Alternative
Local Exchange Companies Pursuant
to Section 364.162, Florida Statutes

Docket No. 950985-TP
Filed: December 11, 1995

PREHEARING STATEMENT OF
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP

COMES NOW, Sprint Communications Company Limited Partnership ("Sprint"), by and through its undersigned counsel, and in compliance with Order No. PSC-95-1315-PHO-TP, issued October 27, 1995, herewith submits its Prehearing Statement.

A. Witnesses

Sprint intends to call no witnesses, but reserves the right to call rebuttal witnesses, witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony, and witnesses to address issues not presently designated which may be designated by the Prehearing Officer at the prehearing conference held on December 22, 1995.

B. Exhibits

Sprint will present no exhibits, but reserves the right to offer exhibits in rebuttal, for purposes of impeachment and in other circumstances outlined in paragraph A above.

C. Statement of Basic Position

The exchange of local traffic between Southern Bell and ALECs should be based upon mutual compensation to co-carriers for call

ACK ✓
ASA
APP
D. Chase
ERV
G
H
I
J
K
L
M
N
O
P
Q
R
S
T
U
V
W
X
Y
Z

RECEIVED
J. D.

ERVIN, VARN, JACOBS, ODOM & ERVIN TALLAHASSEE, FLORIDA

DOCUMENT NUMBER-DATE

12438 DEC 11 95

FPSC-RECORDS/REPORTING 549

termination under arrangements and levels that encourage development of competition while covering associated costs.

D. Sprint's Position on the Issues

Issue 1: What are the appropriate rate structures, interconnection rates, or other compensation arrangements for the exchange of local and toll traffic between ALEC and Southern Bell?

Position: Rates for call termination should be reasonable. Mutual compensation for call termination should be set at a level that encourages the development of competition and interconnection while covering the associated costs. Compensation should be economically viable; administratively efficient and minimize carrier conflicts; create incentives for competitive infrastructure development; minimize competitive distortions; not be a source of universal service subsidy; promote competitive innovation; and not mirror existing access charge levels.

Issue 2: If the Commission sets rates, terms, and conditions for interconnection between ALEC and Southern Bell, should Southern Bell tariff the interconnects and exchanges local and toll traffic with other LECs today?

Position: Yes.

Issue 3: What are the appropriate technical and financial arrangements which should govern interconnection between ALEC and Southern Bell for the delivery of calls originated and/or terminated from carriers not directly connected to an ALEC's network?

Position: Sprint has no position at this time.

Issue 4: What are the appropriate technical and financial requirements for the exchange of intraLATA 800 traffic which originates from an ALEC customer and terminates to an 800 number served by Southern Bell?

Position: Sprint has no position at this time.

Issue 5a: What are the appropriate technical arrangements for the interconnection of an ALEC's network to Southern Bell's 911 provisioning network such that ALEC's customers are ensured the same level of 911 service as they would receive as a customer of Southern Bell?

Position: ALECs should have access to 911 services provided by the incumbent local telephone company on the same terms and conditions as enjoyed by the incumbent local telephone company.

Issue 5b: What procedures should be in place for the timely exchange and updating of ALEC customer information for inclusion in appropriate E911 databases?

Position: ALECs should have access to 911 services provided by the incumbent local telephone company on the same terms and conditions as enjoyed by the incumbent local telephone company.

Issue 6: What are the appropriate technical requirements for operator traffic flowing between an ALEC's operator services provider and Southern Bell's operator services provider including busy line verification and emergency interrupt services?

Position: ALECs should be afforded co-carrier status such that operator handled traffic is handled just as current operator

handled traffic is handled between LECs today. Conceptually, ALECs are independent LECs that are being implemented to overlay over existing LEC territory. Therefore, procedures used today to provision an independent LEC should be used.

Issue 7: Under what terms and conditions should Southern Bell be required to list an ALEC's customers in its directory assistance database?

Position: ALECs should be afforded co-carrier status such that operator handled traffic is handled just as current operator handled traffic is handled between LECs today. Conceptually, ALECs are independent LECs that are being implemented to overlay over existing LEC territory. Therefore, procedures used today to provision an independent LEC should be used.

Issue 8: Under what terms and conditions should Southern Bell be required to list an ALEC's customers in its universal white and yellow pages directories and to publish and distribute these directories to an ALEC's customers?

Position: ALECs should be allowed to have their customer's telephone numbers included in telephone directories, directory assistance, LICB, AIN, 8700 and other databases and have access to such resources equal in price, functionality and quality as do incumbent local telephone service providers.

Issue 9: What arrangements are necessary to ensure that ALECs can bill and clear credit card, collect, third party calls and audiotext calls?

Position: Sprint has no position at this time.

Issue 10: What arrangements are necessary to ensure the provision of CLASS/LASS services between an ALEC's and Southern Bell's networks?

Position: Sprint has no position at this time.

Issue 11: What are the appropriate arrangements for physical interconnection between the respective ALECs and Southern Bell, including trunking and signaling arrangements?

Position: Sprint has no position at this time.

Issue 12: To the extent not addressed in the number portability docket, Docket No. 950737-TP, what are the appropriate financial and operational arrangements for interexchange calls terminated to a number that has been "ported" to the respective LECs.

Position: Number portability issues will be addressed in Docket No. 950737-TP.

Issue 13: What arrangements, if any, are necessary to address other operational issues?

Position: Sprint has no other issues to address at this time.

Issue 14: What arrangements, if any, are appropriate for the assignment of NXX codes to the respective ALECs?

Position: Numbering policy must be broadly developed and administered in a competitively neutral manner. The LEC must not be able to control the administration and assignment of numbering

resources. NXX assignments must be handled in a neutral and nondiscriminatory manner.

E. Stipulations

There have been no stipulations entered into at the this time.

F. Pending Motions

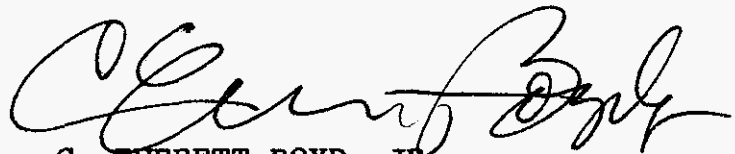
Sprint has no motions pending at this time.

G. Other Requirements

Sprint knows of no requirements Set forth in any prehearing orders with which it cannot comply.

DATED this 17th day of December, 1995.

Respectfully submitted,



C. EVERETT BOYD, JR.
Ervin, Varn, Jacobs,
Odom & Ervin
Post Office Drawer 1170
Tallahassee, FL 32302
(904) 224-9135
and

BENJAMIN FINCHER
Sprint Communications Company
Limited Partnership
3065 Cumberland Circle
Atlanta, GA 30339

Attorneys for Sprint Communica-
tions Company Limited Partnership

CERTIFICATE OF SERVICE

11/14 HEREBY CERTIFY that a copy of the foregoing has been furnished, this day of December, 1995, by U.S. Mail to:

Jill Butler
Time Warner Communications
2773 Red Maple Ridge
Tallahassee, FL 32301

Kenneth Hoffman
Rutledge Ecenia, et al.
215 S. Monroe Street, Suite 420
Tallahassee, FL 32301

Bob Elias
Fla. Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Michael W. Tye
101 N. Monroe Street, Suite 700
Tallahassee, FL 32301

Jodie Donovan-May
Teleport Comm. Group, Inc.
2 Lafayette Center
1133 21st St. N.W., Suite 400
Washington, DC 20036

J. Phillip Carver
c/o Nancy H. Sims
Southern Bell Telephone
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Anthony P. Gillman
Kimberly Caswell
GTE Florida, Incorporated
201 North Franklin Street
Tampa, FL 33601

Peter M. Dunbar
Charles W. Murphy
Pennington Law Firm
Post Office Box 10095
Tallahassee, FL 32302-2095

Laura L. Wilson
Charles F. Dudley
Fla. Cable Television Assn.
310 North Monroe Street
Tallahassee, FL 32301

Angela B. Green
Fla. Public Telecommunications
125 S. Gadsden St., Suite 200
Tallahassee, FL 32301

Floyd Self
Messer Vickers Law Firm
215 S. Monroe Street, Suite 701
Tallahassee, FL 32301

Richard M. Rindler
James C. Falvey
Swidler & Berlin
3000 K Street, N.W., Suite 300
Washington, DC 20007

Patrick K. Wiggins
Marsha E. Rule
Post Office Box 1657
Tallahassee, FL 32302

Donald L. Crosby
Continental Cablevision
7800 Belfort Parkway, Suite 270
Jacksonville, FL 32256-6925

Richard D. Melson
Hopping, Boyd, Green & Sams
Post Office Box 6526
Tallahassee, FL 32314

Michael J. Henry
MCI Telecommunications Corp.
780 Johnson Ferry Rd, Suite 700
Atlanta, GA 30342

Timothy Devine
MFS Communications Co.
250 Williams St., Suite 2200
Atlanta, GA 30303-1034

William H. Higgins
AT&T Wireless Services
250 S. Australian Ave., Ste 900
West Palm Beach, FL 33401

Robin D. Dunson
1200 Peachtree St., N.E.
Promenade I, Room 4038
Atlanta, GA 30309

A.R. "Dick" Schleiden
Continental Fiber Tech
4455 Baymeadows Road
Jacksonville, FL 32217

Bill Wigginton
Hyperion Telecommunications
Boyce Plaza III
2570 Boyce Plaza Road
Pittsburgh, PA 15241

Sue E. Weiske
Time Warner Communications
160 Inverness Drive West
Englewood, CO 80112


Attorney