

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MediaOne
Florida Telecommunications, Inc.
for arbitration of an
interconnection agreement with
BellSouth Telecommunications,
Inc. pursuant to Section 252(b)
of the Telecommunications Act of
1996.

DOCKET NO. 990149-TP
FILED: June 14, 1999

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-99-0716-PCO-TP, the Staff of the Florida Public Service Commission files its Prehearing Statement.

- A. All Known Witnesses: Staff does not intend to sponsor a witness at this time.
- B. All Known Exhibits: Staff has not yet identified a tentative list of exhibits which it intends to utilize in this proceeding. Staff will supply a tentative list of such exhibits at or prior to the Prehearing Conference.
- C. Staff's Statement of Basic Position:

None pending discovery.
- D.-G. Staff's Position on the Issues:

ISSUES:

- 1. Should the audit provisions in the parties' Interconnection Agreement include auditing of services other than billing?

POSITION: Staff takes no position.

- 2. Should calls originated from or terminated to Internet Service Providers ("ISPs") be defined as "local traffic" for purposes of the MediaOne/BellSouth Interconnection Agreement?

POSITION: Staff takes no position.

AFA _____
 APP _____
 CAF _____
 CMU _____
 CTR _____
 EAG _____
 LEG _____
 MAS 2 _____
 OPC _____
 RRR _____
 SEC 1 _____
 WAW _____
 OTH _____

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APPROPRIATE/REPORTING

3. Should calls that originate from or terminate to ISPs be included in the reciprocal compensation arrangements of the Interconnection Agreement?

POSITION: Staff takes no position.

4. What is the appropriate price for Calling Name ("CNAM") data base queries?

POSITION: Staff takes no position.

5. What is the appropriate manner for MediaOne to have access to network terminating wire ("NTW") in multiple dwelling units ("MDU")?

POSITION: Staff takes no position.

6. What is the appropriate demarcation point for BellSouth's network facilities serving multiple dwelling units?

POSITION: Staff takes no position.

7. What, if anything, should BellSouth be permitted to charge MediaOne for access to NTW?

POSITION: Staff takes no position.

8. How many call paths should BellSouth be required to provide to MediaOne, at no cost to MediaOne, for customers who are porting telephone numbers through interim number portability?

POSITION: Staff takes no position.

9. What rate, if any, should BellSouth be allowed to charge for additional call paths provided to MediaOne for customers who are porting telephone numbers through interim number portability?

POSITION: Staff takes no position.

10. In implementing Local Number Portability ("LNP"), should BellSouth and/or MediaOne be required to notify the Number

Portability Administration Center ("NPAC") of the date upon which BellSouth will cut-over MediaOne customer numbers at the MediaOne requested time concurrent with BellSouth's return of a Firm Order Commitment ("FOC") to MediaOne?

POSITION: Staff takes no position.

11. Should BellSouth be required to provide a point of contact to intervene in the execution of LNP orders when changes or supplements are necessary for customer-related reasons, and, if so, what charge, if any, should apply?

POSITION: Staff takes no position.

12. What, if any, performance measurements are appropriate with respect to the provision of stand-alone LNP for MediaOne?

POSITION: Staff takes no position.

13. Should the Florida Public Service Commission arbitrate performance incentive payments and/or liquidated damages for purposes of the MediaOne/BellSouth Interconnection Agreement? If so, what performance incentive payments and/or liquidated damage amounts are appropriate, and in what circumstances?

POSITION: It is the position of staff that this issue is not within the jurisdiction of the Commission and, therefore, should not be addressed in these proceedings.

H. Stipulation

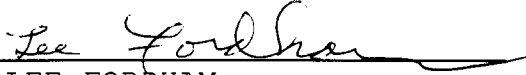
Staff is not aware of any issues that have been stipulated at this time.

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I. Pending Motions:

Staff has no pending motions at this time.

RESPECTFULLY SUBMITTED,


C. LEE FORDHAM
Staff Counsel

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Staff's Prehearing Statement has been served upon Nancy B. White, Esquire, c/o Ms. Nancy H. Sims, 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301-1556, on behalf of BellSouth Telecommunications, Inc., and to James P. Campbell, 7800 Belfort Parkway, Suite 270, Jacksonville, FL 32256-6925, on behalf of MediaOne Florida Telecommunications, Inc., by U.S. Mail, this 14th day of June, 1999.


C. LEE FORDHAM
Staff Counsel

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