

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
MFS Petition Regarding Unbundling)
of Local Exchange Carrier Common)
Line Facilities)

RM - 8614

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COMMENTS OF INTERMEDIA COMMUNICATIONS OF FLORIDA, INC.
IN SUPPORT OF PETITION FOR RULEMAKING

Intermedia Communications of Florida, Inc ("ICI") respectfully submits these comments in support of the Petition for Rulemaking of MFS Communications Company, Inc. ("MFS"). ICI is the oldest and largest competitive access provider in Florida, and provides interstate and intrastate access services and private line services over state-of-the-art fiber ring networks in Jacksonville, Miami, Orlando, St. Petersburg and Tampa. As such, ICI attempts to compete directly against BellSouth, GTE, and other dominant local exchange carriers in Florida. ICI provides a full range of telecommunications services to business customers and is looking for innovative ways to meet its customers' needs. Unbundling of loops, as proposed by MFS, would likely assist ICI in serving its customers in the future (once Florida authorizes local exchange competition) by making it economically and technically feasible for ICI to offer local exchange service through a combination of its own facilities and those of the dominant local exchange carriers.

ICI supports MFS' proposal for unbundling because it will foster competition with incumbent monopolists and by doing so, lower prices to the consumer. The Commission is of course very familiar with the effect on prices that the injection of competition has had in other aspects of telephony, such as long distance service and customer premises

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equipment. We have no doubt that the introduction of competition into the provision of local telephone service will have a similar effect. At present, however, carriers wishing to compete with the dominant LECs in furnishing switched local exchange service have no economically practical means of achieving a connection with each customer. In all but the most densely built-up areas, it would be infeasible (because of cost and permitting considerations) for new entrants to duplicate the incumbent's ubiquitous network. It would also be wasteful of societal resources. Because companies like ICI cannot obtain cost-effective use of the existing network of telephone wires that are already in place, except for a very few customers, the benefits of competition in local telephone service are unavailable. It seems obvious that it should be more cost-effective and therefore result in lower prices to consumers if the existing telephone companies were required to make their wires available to other carriers, such as ICI, at reasonable prices, instead of requiring the new carriers to duplicate these facilities. MFS' Petition for Rulemaking asks the FCC to open up these existing wires for use by all carriers, and we support this effort.

The unbundling proposal made by MFS, if implemented, will surely lead to competition in the provision of local telephone service in most, if not all, markets. Throughout the United States, carriers are eager to enter local markets and bring competition to them. All that is preventing entry in many cases is the ability to obtain access to the incumbent's local loop at a reasonable price. Unbundling is feasible. The dominant carriers in New York, where the Public Service Commission has ordered unbundling, have conceded the technical feasibility of unbundling the local loop. But

dominant carriers are not offering to unbundle the local loop without a fight. The prospect of a long and costly proceeding before each state regulatory agency is a real barrier to entry. The FCC's leadership on a national level is needed to bring down that barrier and help provide the benefits of competition to consumers of local telephone service in all 50 states.

Approval of MFS' Petition will result in competitive local dialtone services becoming available to many more consumers, including both small businesses and residential users, at lower prices. ICI urges that the Commission act to facilitate local telephone competition throughout the United States by granting this petition as soon as possible.

Dated: April 10, 1995

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of April 1995, copies of Comments of Intermedia Communications of Florida, Inc. In Support of Petition For Rulemaking were served by hand on the following:

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