FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of Rulemaking to Amend Rules in Chapters 25-4 and 25-24, F.A.C., to Address Publication of Service Schedules by Telecommunications Companies	)	UNDOCKETED

POST RULEMAKING WORKSHOP COMMENTS OF SPRINT

Sprint Nextel Corporation, on behalf of itself and Sprint Communications Company Limited Partnership, its wholly-owned subsidiary providing wireline telecommunications services in the State of Florida ("Sprint"), provides the following brief Comments on the Rulemaking Workshop in the above-captioned matter held at the Florida Public Service Commission ("Commission") on March 30, 2010.

I. Introduction

Sprint has been granted authority by the Commission to operate as an intrastate interexchange telecommunications company and a competitive local exchange telecommunications company in Florida. Such entities have traditionally been afforded light regulation by the Commission and the Florida Legislature[1] and the recent legislative changes to § 364.04, Florida Statutes ("Schedules of rates, tolls, rentals, and charges; filing; public inspection"), are not intended in any way to change that approach. In fact, the intent of the legislation is to replace outmoded traditional tariffs filed at the Commission with the flexibility to communicate the rates, terms and conditions of

[1] For instance, an intrastate, interexchange telecommunications company is excluded from the definitions of "telecommunications company" and is subject only to portions of §364, Florida Statutes, that are specifically enumerated in § 364.02(14), F.S.

service to customers by other means that are more convenient for both customers and service providers, including posting service schedules online. And Commission Staff made it clear during the Rulemaking Workshop that the proposed rules under development are designed not to add requirements or expand the scope of the existing tariffing rules, but merely to change them to accommodate the alternative means of publishing rate schedules contemplated by the new § 364.04, F.S.

Sprint already has notified the Commission of its decision to withdraw its intrastate interexchange tariff and publish its schedule online consistent with the guidelines provided by Staff.[2] Sprint looks forward to continuing to work with Staff as it considers these rule changes. Overall, and as outlined below, Sprint urges that if the Commission believes any regulations are necessary and authorized under the recent changes to § 364.04, F.S., it should tailor such rules narrowly and ensure no unintended and unnecessary regulatory burdens result.

II. Rulemaking Authority and Purpose

As a threshold matter, the Staff and Commission should consider whether there exists a grant of rulemaking authority in the new § 364.04 that is sufficient to engage in the rulemaking that is contemplated. As Staff is aware, § 120.536, F.S., "Rulemaking authority; repeal; challenge," states that there must be "a grant of rulemaking authority" and that "an agency may adopt only rules that implement or interpret the specific powers and duties granted by the enabling statute." The original version of § 364.04 included references to actions to be taken by the Commission under the law that could be

[2] See "Guidelines For A Telecommunications Company That Will No Longer File Its Schedules With The FPSC," September 16, 2009.

interpreted to grant rulemaking authority (e.g., "*[u]pon order of the commission*, every telecommunications company shall file..."; public inspection copies shall be made accessible "*at such places as may be designated by the commission*"; a notice regarding schedules "shall be kept posted by every telecommunications company *as the commission designates.*") Sprint agrees with comments made by participants during the workshop that there is no rulemaking authority provided in the new § 364.04. The new section addresses only action to be taken by telecommunications companies and contains no instances like those in the prior version of the section cited above that would authorize rulemaking or Commission action. Instead, the new section is self-executing and rulemaking is neither authorized nor needed.

While it appears that Staff believes rules are necessary to achieve other goals (e.g., to facilitate the process of processing consumer complaints), such goals do not provide sufficient authority for rulemaking in this instance under § 120.536, F.S. ("No agency shall have authority to adopt a rule only because it is reasonably related to the purpose of the enabling legislation and is not arbitrary and capricious or is within the agency's class of powers and duties, nor shall an agency have the authority to implement statutory provisions setting forth general legislative intent or policy.")

While it may be defensible to retain existing rules for telecommunications companies that wish to continue to file tariffs with the Commission on the basis that the Commission has a role in receiving and processing such tariffs, there is no authority to promulgate rules related to the alternative schedules not filed with the Commission. The statute does not define a role for the Commission with respect to such schedules and, further, provides very specific requirements for telecommunications companies such that no rulemaking is

required. Thus, Sprint urges the Commission to consider whether rulemaking authority has been granted to permit development of the rules proposed.

III. Comments on Specific Rule Proposals

In the event the Commission chooses to move ahead with the proposed rules, Sprint provides the following comments on specific provisions. The rules should not expand carriers' obligations with respect to schedules and should instead provide greater flexibility than was provided in the past for Commission-filed tariffs. Sprint has been engaged in a detariffing project over the last several years to develop online resources for consumers and, where possible, to incorporate intrastate rates, terms and conditions into a single intrastate schedule posted online. This reduces administrative burden and makes it easier for consumers to find the information they need. The specific comments provided below address concerns with portions of the proposed rules that would make it difficult or impossible for Sprint to continue to consolidate and simplify its schedules as states like Florida remove tariffing requirements and permit online publication. Sprint also agrees with commenters during the workshop that the new rules should not seek to increase the current requirements competitive local exchange carriers must meet for schedules filed at the Commission. Such rules should, at a minimum, be no more onerous than the requirements that exist today.

As an initial matter, Sprint notes that the proposed rules would treat intrastate interexchange telecommunications companies and competitive local exchange companies largely the same as incumbent local exchange carriers in terms of requirements for publication of schedules. The rules do so by incorporating most of the rules covering

incumbents in 25-4.034 into the rules covering intrastate interexchange carriers in 25-24.470 and 25-24.485 and competitive local exchange carriers in 25-24.835. The proposed rules also would retain almost all of the requirements applicable to interexchange carrier tariffs before the recent legislative changes and actually add new requirements (e.g., inclusion of "fees and surcharges" in the schedules). The proposed rules would add rules as to the form and substance of CLEC schedules filed at the Commission. Sprint respectfully urges the Commission to re-consider whether such treatment is necessary given the characteristics of the interexchange market in Florida. The diversity and number of interexchange service providers in Florida and the intense competition between them strongly supports a minimalist approach. Consumers have abundant options and may easily change providers. In this environment, they are best served by allowing carriers to communicate with consumers flexibly in the most efficient way possible as dictated by market conditions and not as required by administrative rules. Interexchange carriers should be freed as much as possible to quickly respond to market conditions, streamline operations and keep costs down. Similarly, regulation of CLEC schedules should be decreased, not increased as called for in the proposed rules. Particularly after the legislative changes to § 364.04, the focus should be on eliminating rules, not carrying them forward or adding new ones.

A. New Requirement Regarding Fees and Surcharges

Sprint opposes any requirement that specific charges for "fees and surcharges" be included in the schedules of intrastate interexchange telecommunications companies or competitive local exchange carriers. Proposed Rule 25-4.034(1) would require

telecommunications companies to publish schedules that set forth "all intrastate rates and charges for customer services, *fees and surcharges*, the classes and grades of service available to subscribers, the conditions and circumstances under which service will be furnished, and all general rules and regulations governing the relation of customer and company." (See Notice of Proposed Rule Development, p. 8, line 5, emphasis added)[3] Previously, "fees and surcharges" have not been tariffed in Florida.

The Commission should not require intrastate interexchange telecommunications companies or CLECs to include charges for "fees and surcharges" in their schedules because such charges vary widely and the charges may be outside the Commission's intrastate jurisdiction. Further, in a highly competitive market such as the market for long distance services, customers are free to "vote with their feet" and change providers if they are unhappy with such charges.

Finally, the new legislative changes to § 364.04, F.S. do not provide the express rulemaking authorization necessary for the Commission to promulgate such a rule. That section makes no mention of "fees and surcharges" and, as discussed above, provides no rulemaking authorization. The legislature is aware of fees and surcharges but chose not to include them in the deregulatory changes to §364.04 and did not provide rulemaking authority with respect to such charges. To prove the point, one need only look to a different portion of § 364 where the legislature did expressly include such charges and

[3] Portions of Rule 25-4.034 are incorporated by reference into the proposed rules impacting IXC and CLEC schedules. (See proposed Rules 25-24.470(2) and 25-24.485 (covering IXCs) and proposed Rule 25-24.8359covering CLECs). Specifically the draft rules incorporate Rule 25-4.034 (1)(a) through (e), (g) through (i) as applicable to intrastate interexchange carriers and CLECs. However, the "fee and surcharge" requirement appears in 25-4.034(1), before the incorporated 25-4.034(1)(a). Therefore, it is somewhat unclear whether the Staff would seek to apply this requirement to intrastate interexchange telecommunications companies and CLECs because the requirement that "fees and surcharges" be included is set forth in proposed Rule 25-4.034(1) and only later portions of Rule 25-4.034(1) are incorporated by reference as applicable to intrastate interexchange telecommunications companies and CLECs.

provide rulemaking authority. § 364.604, F.S., "Billing practices," requires that "[e]ach billing party must clearly identify on its bill the name and toll-free number of the originating party; the telecommunications service or information service billed; and the specific charges, taxes, and *fees* associated with each telecommunications or information service." [emphasis added] Further, § 364.604, F.S., expressly states that with respect to billing practices, "[p]ursuant to s. 120.536, the commission may adopt rules to implement this section." No such mention of fees or surcharges and no such rulemaking authority is provided in the new § 364.04, F.S.

B. Continued Tariffing of Promotions is Unnecessary

As discussed above, the Commission should eliminate rules affecting intrastate interexchange carriers, not perpetuate them. Sprint respectfully urges the Commission to reconsider the need for the requirement that promotional offerings be included in schedules going forward. (See Notice of Proposed Rule Development, p. 8, line 20 through p. 9, line 1) In the intensely competitive long distance market, consumers are going to learn about promotions more through active publicity and marketing and less through information published in schedules as required by Commission rules. The requirement would serve only to create additional administrative tasks and burdens for the competing carriers and ultimately increase service costs. While a single such requirement in isolation may seem innocuous (e.g., requiring carriers to post promotions in their online schedules), each such separate state requirement makes it harder for carriers to simplify and streamline their process for posting rates. Ultimately, such requirements divert resources from the best option for consumers and carriers alike - communicating with consumers whichever way is most effective in the marketplace.

C. Clarification of "Florida-Specific Service Schedule" Requirement

Sprint is concerned that the language included in the draft rules referring to "Florida-specific service schedules"[4] inadvertently creates a requirement that carriers publishing their schedules online must publish a separate schedule for Florida even though Florida-specific rates can be published in a consolidated intrastate schedule covering multiple states. As discussed above, Sprint has pursued a project to consolidate intrastate rates, terms and conditions into a single online intrastate service schedule. The project is designed to reduce administrative burden and makes it easier for consumers to find the information they need. Such an approach complies with § 364.04, F.S., which requires only that the published schedule show "the rates, tolls rentals, and charges of [the] company for service to be performed within the state." The statute does not require a separate "Florida-specific service schedule."

Sprint believes that the statute is self-effectuating and does not require or authorize rulemaking to implement it. However, if the Commission seeks to propose rules, it should ensure they track the language and intent of the statute by removing the phrase "Florida-specific service schedules." Instead the proposed rules should refer only to "service schedules consistent with Sec. 364.04, F.S."

D. The Commission Should not Impose Additional Requirements on Filed CLEC Schedules

Sprint agrees with commenters during the workshop that the Commission should not consider imposing additional requirements on CLEC schedules filed at the Commission. It would appear, however, that the proposed rules would do just that,

[4] See Notice of Proposed Rule Development, p. 8, lines 3-4; p. 13, line 7; p. 14, line 15.

applying the same formatting and form rules that apply to incumbent LECs. For years CLECs have filed price lists according to existing rules and should at very least be permitted to continue to do so without change. As discussed above, the legislative changes to § 364.04 are deregulatory in nature and should not result in greater regulatory burden on CLECs. Further, there is no legislative authorization for the Commission to place new requirements on CLECs as contemplated in the proposed rule.

IV. Conclusion

For the reasons set forth above, Sprint respectfully requests that the Commission adopt its recommendations set forth herein and refrain from rulemaking on this topic on the basis that it is nether authorized nor necessary pursuant to § 364.04, F.S. However, Sprint urges that if the Commission believes any regulations are necessary and authorized under the recent changes to § 364.04, F.S., it should tailor such rules narrowly and ensure no unintended and unnecessary regulatory burdens result.

Respectfully submitted this 7th day of May, 2010

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May 7, 2010

VIA ELECTRONIC FILING

Ms. Ann Cole
Director
Commission Clerk & Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket No. 100000

Dear Ms. Cole:

Attached for filing in the above-referenced Docket, please find tw telecom of florida, l.p. and the Competitive Carriers of the South, Inc.'s comments requested by Commission staff at the March 30, 2010 workshop.

Your assistance is greatly appreciated. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Matthew Feil

Enclosure

STATE OF FLORIDA
PUBLIC SERVICE COMMISSION

In Re: Initiation of Rulemaking to Amend Rules in Chapters 25-4 and 25-14, F.A.C., To Address Publication of Service Schedules by Telecommunications Companies	))))))	Docket No. UNDOCKETED

COMMENTS OF TWTC TELECOM OF FLORIDA, L.P. and COMPETITIVE CARRIERS OF THE SOUTH, INC.

Pursuant to the request of the Commission staff at the March 30, 2010, workshop held in the above-captioned matter, tw telecom of florida, l.p.("TWTC") and the Competitive Carriers of the South, Inc. ("CompSouth")[1] hereby submit the following comments.

Introduction

The Commission's approach to any rules in this proceeding should be governed by the following guiding principles: (1) Any form/substance rule requirements for CLEC filed schedules[2] should not impose obligations that would cause current CLEC price lists and existing filing practices to be non-compliant; (2) Form/substance rule requirements for CLEC filed schedules should not be imposed without the Commission's acknowledging that such schedules come with filed rate doctrine status; and (3) There should be extremely limited or no form/substance requirements for posted CLEC schedules, and no requirement to notify the Commission of changes to posted schedules.

[1] Sprint, a CompSouth member, does not join in this filing.

[2] Throughout these comments, references to "filed" schedules means those filed with the Commission and "posted" schedules means those not filed with the Commission but available via website or other published means.

CLEC Price Lists v. Filed Schedules

As staff acknowledged at the workshop, the biggest change in the proposed rules over the current rules is the imposition of specific form/substance requirements for CLEC schedules. And, as AT&T noted at the workshop, it would be ironic if after the 2009 de-regulatory legislative changes, the Commission were to impose **more** regulation on CLECs than existed before those legislative changes. However, TWTC and CompSouth believe that if current CLEC price lists on file with the Commission and current CLEC filing procedures for price lists are compliant with any new filed schedule rules, then such rules would not effectively impose an additional burden on CLECs. TWTC and CompSouth maintain that any new rules should **not** impose any new/additional burdens as to the form or filing process for schedules.[3] CLEC price lists currently on file should not have to be re-formatted, re-written, re-labeled, or re-filed. Going-forward, CLECs who choose to file schedules should be able to file those schedules (and changes thereto) in the same manner as, and consistent with what was the generally accepted industry practice, under the prior price list regime.[4] Accordingly, there should be no requirement that service levels offered for all non-basic services be included in filed schedules, as the existing rule requires a service level description only for basic service.[5] And, as AT&T pointed out at the workshop, inclusion of all "fees and surcharges" should not be required for filed schedules, among other things not currently required.

[3] Nor should there be any new noticing burdens on CLECs.

[4] TWTC and CompSouth, however, tend to agree with Century Link that it is not necessary for going-forward schedule changes to be in legislative format, with marginal notations. An explanation of the changes via correspondence with the filing should suffice.

[5] Compare existing 25-24.825(1) with proposed 25-24.825(1). Under the existing price list regime, some CLECs may include service level information for certain, but not all, of the CLEC's non-basic services.

Filed Schedules and Filed Rate Doctrine

TWTC and CompSouth believe that it would be inconsistent for the Commission to impose rules regarding form/substance of filed schedules without also acknowledging that such schedules have filed rate status, particularly if the Commission intends to enforce such filing rules or if the Commission intends to enforce all or part of the content of filed schedules as between a CLEC and its customers. Accordingly, rules for CLEC filed schedules should not be imposed without acknowledgment that such requirements come with filed rate status.

Posted Schedules

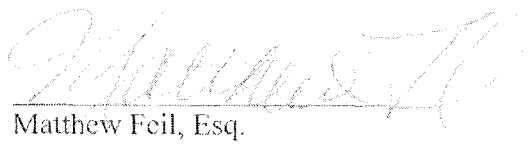
TWTC and CompSouth assert that if a CLEC chooses to post its schedules on a website rather than file schedules with the Commission, the posted schedules should not be subject to Commission rules on form/substance. Carriers were given a choice of filing or posting schedules. Posting schedules should be seen as a carrier's having made the definitive choice to step outside the realm of the traditional regulatory regime, by-pass the burdens and benefits that go along with that regime, and accept the de-regulated environment of private contracts. Not only should there be few, if any, form/substance rules for posted schedules, there should be no requirement that the Commission be notified each time there is a change to posted schedules. As long as schedules are posted and a carrier is able to produce a history for the posted schedules when the Commission so requests, the Commission should have sufficient access to the information it needs when it needs it.

Other Comments

TWTC and CompSouth support preserving the language staff has proposed to delete on page 8, lines 8 – 12 (Rule 25-4.034 of the Notice). This language addresses current Commission practice regarding contract service arrangements. The current practice regarding such contracts should not change; and staff stated at the workshop there was no intent that it change. Therefore, the current rule language should remain in place. This will avoid questions and confusion.

In addition, while making any rule changes to Chapter 25-24, the Commission should delete (1)(d) of Rule 25-24.820, Florida Administrative Code, which appears to enable the PSC to revoke a CLEC certificate for "violation of" a price list (or, in the future) a schedule. This rule, aside from being unduly discriminatory (there is no similar rule for ILECs or IXCs) is needless and far too onerous.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by Email this 7th day of May, 2010.

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By: _____
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May 7, 2010

FILED ELECTRONICALLY
Ms. Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Undocketed Proposed Rules Related to Publication of Service Schedules

Dear Ms. Cole:

Enclosed please find CenturyLink's Post Workshop Comments in the above Undocketed matter.

If you have any questions regarding this electronic filing, please do not hesitate to call my assistant, Roberta Cooper at (850) 599-1563.

Sincerely,

/s/ Susan S. Masterton
Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Rulemaking to amend rules in Chapters 25-4 And 25-24, F.A.C., to address Publication of Service Schedules by Telecommunications Companies.	**Docket No.:** Undocketed **Filed:** May 7, 2010

CENTURYLINK'S POST WORKSHOP COMMENTS

In accordance with the Staff's request at the March 30, 2010 Workshop in this matter, CenturyLink[1] submits the following post-workshop comments to address the draft rule changes discussed at the workshop, as well as additional suggested changes. CenturyLink also is attaching a legislative mark-up of the Proposed Rule showing CenturyLink's suggested changes. CenturyLink's changes to the staff's draft are highlighted in yellow.

Scope of Rule 25-4.034

CenturyLink supports the Commission's efforts to revise the rules related to publication of tariffs or service schedules to reflect the statutory changes enacted in 2009 and the rule changes made last year. CenturyLink believes the rule changes should recognize the increasingly market-based approach to telecommunications regulation in Florida. In this vein, CenturyLink suggests that the rules should address the styling and timing, rather than the content, of tariff filings and should not expand upon the statutory requirements.

[1] These comments are filed on behalf of all of the affected CenturyLink entities in Florida, including, Embarq Florida, Inc. d/b/a CenturyLink, Embarq Communications, Inc. d/b/a CenturyLink Communications, CenturyTel Long Distance, LLC d/b/a CenturyLink Long Distance and Madison River Communications, LLC d/b/a CenturyLink.

CenturyLink's approach is consistent with the parameters for Commission rulemaking set forth in the Administrative Procedures Act. Specifically, s. 120.536, F.S. provides:

120.536 Rulemaking authority; repeal; challenge.--

> (1) A grant of rulemaking authority is necessary but not sufficient to allow an agency to adopt a rule; a specific law to be implemented is also required. An agency may adopt only rules that implement or interpret the specific powers and duties granted by the enabling statute. No agency shall have authority to adopt a rule only because it is reasonably related to the purpose of the enabling legislation and is not arbitrary and capricious or is within the agency's class of powers and duties, nor shall an agency have the authority to implement statutory provisions setting forth general legislative intent or policy. Statutory language granting rulemaking authority or generally describing the powers and functions of an agency shall be construed to extend no further than implementing or interpreting the specific powers and duties conferred by the enabling statute.

In addition, as Mr. Hatch noted at the March 30, 2010 Rule Development Workshop, this approach is consistent with the "generic legislative intent language" guiding the Commission's exercise of its jurisdiction. (Tr. at 8) Specifically, section 364.01(4)(b), Florida Statutes, directs the Commission to exercise its authority in a manner that will "encourage competition through flexible regulatory treatment among providers of telecommunications services in order to ensure the availability of the widest possible range of consumer choice in the provision of all telecommunications services." Paragraphs (f) and (g) of section 364.01(4), similarly direct the Commission to exercise its regulatory authority in a manner that encourages competition.

Revisions to Specific Provisions

Consistent with the scope and intent of the Commission's rulemaking authority and section 364.04, F.S., CenturyLink recommends that subsections (2), (3) and (4) in Rule 25-4.034 be stricken. The requirements of section 364.04, F.S., speak for themselves and further clarification through rulemaking is not necessary, or appropriate. In addition, staff indicated at the workshop that the information required by subsection (4) was primarily related to Schedule 8 information and not to tariff information, further supporting deletion of this subsection. (Tr. at 29)

CenturyLink also recommends that the phrase "fees and surcharges" should not be added to the language in Rule 25-4.034 (1). Rather, the language in the rule should reflect the statute and should say "intrastate rates, tolls and rentals and charges for customer services." Additionally, CenturyLink believes that the statement regarding contract service arrangements should remain in Rule 25-4.034(1) for purposes of clarity.

CenturyLink also suggests several revisions to specific provisions of the proposed rules, as follows:

- With regard to 25-4.034 (5), CenturyLink recommends that the rule be clarified to indicate that customer notice can be made electronically if the customer chooses to receive the bill electronically.
- With regard to 25-4.034(7)(g), CenturyLink suggests elimination of the requirement that tariff changes be filed in legislative format. Currently, in CenturyLink's thirty-three state region, only three states in addition to Florida require legislative format

and one of those permits the legislative mark ups to be hand-written.[2] Preparing filings in legislative format is time-consuming and administratively burdensome. As an alternative, the Company suggests that each tariff filing contain an Exhibit A which is the current tariff page(s) for which the revisions are being proposed and an Exhibit B which is the revised tariff pages. For further clarity, the Company could bold the changes on Exhibit B. Also, if a company chooses to detariff and post price schedules on the internet, that company should not be required to post superseded/outdated pages. A requirement to post all superseded/outdated pages would outweigh the administrative benefits of detariffing.

- With regard to Rule 25-24.470, relating to the service schedule section applicable to IXCs, CenturyLink has no changes to the staff's proposal but does point out that four of the five statutes cited in the "Law Implemented" reference are not applicable to IXCs. Those statutes are 364.051, 364.08, 364.183 and 364.3381.

- With regard to Rule 25-24.825 (1), CenturyLink agrees with the comments made by Mr. Hatch at the workshop that it is unnecessary and inconsistent with the trend toward market-based regulation of telecommunications to expand the requirements for CLECs' price schedules. (Tr. at 39) In addition, the changes staff suggests on line 2 of page 22of the proposed rule, i.e., deletion of the words "basic local," puts paragraph (d) in conflict with Section 364.337(5), F.S., which only requires CLECs to include the levels of service quality the company holds itself out to provide for basic local service. Therefore, the scope of the rule should remain "basic local telecommunications service" and the words "basic local" should be reinserted.

[2] The three other states which require legislative formatting are Oklahoma, Maryland and Oregon. CenturyLink is an ILEC in only one of those states.

Conclusion

In conclusion, CenturyLink supports rule changes which reflect market-oriented regulatory environment for telecommunications companies in Florida. Accordingly, CenturyLink requests the Commission to adopt the rule changes suggested by CenturyLink in the attached document.

Respectfully submitted this 7th day of May, 2010.

/s/ Susan S. Masterton
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COUNSEL FOR CENTURYLINK

25-4.034 Service Schedules ~~Tariffs~~.

(1) Pursuant to Section 364.04, F.S., ~~Except to the extent otherwise permitted by Section 364.051(5)(a), F.S.,~~ each telecommunications company shall publish its Florida-specific service schedules ~~maintain on file with the Commission tariffs~~ which shall set forth all intrastate rates, tolls, rentals and charges for customer services, ~~fees and surcharges, the classes and grades of service available to subscribers, the conditions and circumstances under which service will be furnished, and all general rules and regulations governing the relation of customer and company.~~ The rates and charges for contract service arrangements for an individual customer need not be filed where the company's tariff provides a description of the circumstances under which such arrangements are offered for specified tariffed services.

(2) The schedules shall plainly state the places telecommunications service will be rendered and shall also state separately all charges and all privileges or facilities granted or allowed and any rules or regulations or forms of contract which may in anywise change, affect, or determine any of the aggregate of the rates, tolls, rentals, or charges for the service rendered.

~~(a) Service schedules shall be clearly written in simple words, sentences and paragraphs, avoiding unnecessarily long, complicated or obscure phrases or acronyms so that the customer is able to understand the services offered.~~

~~(b) Service schedules shall have a table of contents or index identifying the location of the rates, fees and surcharges, terms and conditions for service.~~

~~(c) Service schedules shall fully define company-specific technical terms and abbreviations.~~

~~(d) No public statement of service quality, rates, or service offerings or billings shall be misleading or differ from the terms stated in the service schedules.~~