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Public Service Commission

January 24, 2002

VIA ELECTRONIC FILING

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW - TW-A325
Washington, DC 20554

Re: CC Docket No. 96-262, Access Charge Reform
CC Docket No. 94-1, Price Cap Performance Review For Local Exchange Carriers

Dear Ms. Salas:

Forwarded herewith are Comments of the Florida Public Service Commission in the above dockets with regard to the cost review proceeding for residential and single-line business Subscriber Line Charge (SLC) caps.

Sincerely,

/ s /

Cynthia B. Miller, Esquire
Office of Federal and Legislative Liaison

CBM:tf

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Access Charge Reform)	CC Docket No. 96-262
)	
Price Cap Performance Review)	CC Docket No. 94-1
For Local Exchange Carriers)	

**FLORIDA PUBLIC SERVICE COMMISSION
COMMENTS ON THE COST REVIEW PROCEEDING FOR RESIDENTIAL AND
SINGLE-LINE BUSINESS SUBSCRIBER LINE CHARGE (SLC) CAPS**

As a result of the Coalition for Affordable Local and Long Distance Service (CALLS) proposal, the primary residential and single-line business subscriber line charge (SLC) was increased on July 1, 2000, and July 1, 2001. The FCC committed that before any further increases were approved, it would “review any increases to residential and single-line business SLC caps above \$5.00 to verify that any such increases are appropriate and reflect higher costs where they are to be applied.” (CALLS Order, ¶83)

The Florida Public Service Commission respectfully submits its comments in this proceeding. We are pleased that the FCC is reviewing the cost documentation provided by the companies, before allowing additional increases in the SLC. As the charges added to a customer’s bill have steadily increased over recent years, it has become increasingly important to evaluate such charges carefully. We have several concerns with the proposed increases and believe that the FCC should carefully scrutinize these cost studies.

Our first concern is with the policy of charging consumers in all states the same SLC for a given company. Since its inception, customers in all states served by a given local exchange company have paid the same SLC, without regard to the costs in the individual states. However, as the SLC steadily increases, we are concerned that consumers in lower cost states more and more will be subsidizing telephone service in higher cost states. The SLC is a recovery mechanism for the interstate portion of a local exchange carrier’s common line costs that is paid via a customer’s local service bill. The

practice of averaging the SLC across all states a company serves means that customers in lower cost states will subsidize telephone service in higher cost states. Consumers in high-revenue, low-cost states already subsidize local service in states with high loop costs through the federal universal service fund (USF). Contributions to that fund are based on company revenues, while funding is distributed to companies based on cost. As a result, consumers in states with low-cost companies may pay significant amounts into the USF, while the companies in such states often receive little or no funding in return. Florida is one such state in which customers subsidize rates in other states through the federal USF.

When SLC increases do not reflect the cost of service in a given state, consumers cannot benefit from being served by a low-cost company. Further, the SLC amount that is paid will not be based truly on cost, except in a very broad sense. The resulting subsidization may cause rates in all states to be driven towards each other. We question whether it is the FCC's intent that all consumers nationwide pay the same rate for phone service, regardless of cost. The Florida Public Service Commission suggests that the SLC be made state-specific for each company. The companies have filed cost information for each state they serve. Thus, the rate proposals presented to the FCC contain information that will allow the SLC to be set on a deaveraged basis.

We also have a specific concern with the rate proposals themselves. While we would like to address the Verizon, Sprint, and BellSouth cost studies, we only have comparative numbers for BellSouth in Florida. We have a UNE proceeding in progress for Verizon and Sprint. As a result, we cannot comment on their cost proposals at this time. Therefore, we will limit our discussion of specific costs to BellSouth's studies.

BellSouth provided a forward-looking cost study to the FCC that it says reflects its cost of providing retail voice grade access for primary residential and single-line business customers to the public switched network. This study differs from those used for universal service calculations and UNE rates in Florida and elsewhere. In its discussion of the SLC study, BellSouth notes that the "costs are not substitutes for nor should they be considered as appropriate for Unbundled Network Element (UNE)

costs, universal service costs, or for any other purpose.” (Cost Study Summary, page 1) BellSouth does not explain why it is inappropriate for its study to be used for other purposes. We note that there are differences in the costs included for wholesale and retail pricing, such as exclusion of most marketing and billing and collection costs from UNE rates. By considering these differences, and adjusting the Florida UNE study to reflect retail instead of wholesale costs, we believe a comparison can be made to show that the charge proposed by BellSouth is excessive.

Our specific concern with the difference between BellSouth’s reported SLC costs and the costs found in the Florida UNE proceeding for BellSouth is the amount of common cost that is included.¹ Using the Florida UNE study, our calculation indicates that the 25 percent interstate portion of the UNE rates for a loop and port would be \$4.49, including common costs. However, BellSouth proposes to the FCC that its SLC be based on a Florida cost of \$6.05, a difference of \$1.56. The major driver of this difference appears to be common costs. BellSouth included \$1.54 for common costs in its SLC proposal—a markup of 34 percent. In the Florida UNE proceeding, a wholesale common cost factor of approximately 7.5 percent was used in developing the rates. By applying BellSouth’s methodology from that UNE docket, but using retail costs instead of wholesale costs, a retail common cost factor of approximately 17 percent is produced. We believe this is a more appropriate level of common cost to be used in setting the SLC. The SLC cost resulting from using a 17 percent common cost factor then would be \$5.27, if the remainder of BellSouth’s cost submission is accepted. This level of cost does not justify increasing the SLC in Florida to \$6.00. Further analysis of all the costs submitted by BellSouth is warranted. We believe the SLC in Florida should remain at \$5.00 until a thorough investigation of the costs can be made.

It is important to recognize that the level of UNE rates established in the Florida UNE proceeding was the result of a lengthy hearing process, while the SLC submission to the FCC has not been subjected to the same level of scrutiny. The staff of the Florida Public Service Commission will

¹Docket No. 990649A-TP, Order No. PSC-01-2051-FOF-TP, issued October 18, 2001.

be happy to work with the FCC in examining the costs submitted by the companies to ensure that they are appropriate.

Consumers have endured continual increases to what they perceive as their local rates through the addition of interstate universal service charges and the increases in the SLC, among other things. We urge the FCC to do two things to help ensure that residential and small business telephone customers do not suffer unnecessarily such further increases. First, the FCC should undertake a thorough review of the costs of the SLC on a state-by-state basis that goes beyond the minimal level of examination possible with the cost submissions the FCC has before it. Second, the FCC should deaverage the SLC on a state basis for each company. We believe these two actions will help protect consumers from paying more than a fair amount for the SLC.

Respectfully submitted,

/ s /

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DATED: January 24, 2002

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing comments will be mailed to the persons on the attached list.

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