

SWIDLER
&
BERLIN

CHARTERED

506
m

October 10, 1995

Ms. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 950737-TP

Dear Ms. Bayo:

Enclosed are an original and fifteen copies of Metropolitan Fiber System of Florida, Inc.'s corrected version of the Direct Testimony of Timothy Devine originally filed in Docket No. 950737-TP on September 1, 1995. Please substitute this version for the version previously filed in the above-captioned docket.

For your easy reference, the following revisions have been made to the original version:

- 1) The margins have been changed to be in accordance with the rules of the Florida Public Service Commission;
- 2) Page 4, line 22 - page 5, line 1 should now read: "Yes. Metropolitan Fiber Systems of Florida, Inc. was certificated as an Alternative Access Vendor ("AAV") on February 24, 1993.";
- 3) Note deletion of bracketed material on page 6, line 7;
- 4) Page 11, line 6-7 notation in parentheses should now read "(Exhibit B hereto at 3).";

✓
 ICK _____
 IFA _____
 IPP _____
 IAF _____
 IAD Taylor _____
 ITR _____
 IAS _____
 IES 1 _____
 IEF 5 right _____
 IEC _____
 IED _____
 IEE _____
 IEF _____
 IEG _____
 IEM _____
 IEN _____

RECEIVED & FILED
 DIVISION OF RECORDS AND REPORTING
 FLORIDA PUBLIC SERVICE COMMISSION
 TALLAHASSEE, FLORIDA

3000 K STREET, N.W. ■ SUITE 300
 WASHINGTON, D.C. 20007-5116

(202)424-7500 ■ TELEX 701131 ■ FACSIMILE (202)424-7645

DOCUMENT NUMBER-DATE
 10076 OCT 11 1995
 FPSC-RECORDS/REPORTING

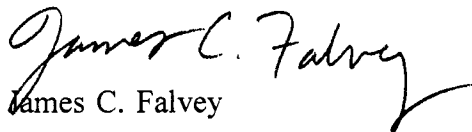
Ms. Blanca S. Bayo
October 10, 1995
Page 2

- 5) Note deletion of bracketed material on page 16, lines 5-7; and
- 6) There is no Exhibit C. Thus, the last sentence on page 19, line 3 should read "See copy attached as Exhibit B hereto."

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies were served on the parties of record pursuant to the attached certificate of service.

Thank you very much for your prompt attention to this matter.

Very truly yours,


James C. Falvey

ATTORNEY FOR
METROPOLITAN FIBER SYSTEMS
OF FLORIDA, INC.

Enclosures
cc: All parties of record

BEFORE THE
FLORIDA
PUBLIC SERVICE COMMISSION

In re: Investigation into temporary)
local telephone number portability) Docket No. 950737-TP
solution to implement competition in)
local exchange telephone markets.) Date: September 1,
) 1995

DIRECT TESTIMONY OF TIMOTHY T. DEVINE
ON BEHALF OF
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.
Docket No. 950737-TP

DOCUMENT NUMBER-DATE
10076 OCT 11 82
FPSC-RECORDS/REPORTING

DIRECT TESTIMONY OF TIMOTHY T. DEVINE
ON BEHALF OF
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.
Docket No. 950737-TP

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 **A.** My name is Timothy T. Devine. My business address
3 is Metropolitan Fiber Systems of Florida, Inc.
4 ("MFS"), 250 Williams St., Atlanta, Georgia 30303.

5 **Q. WHAT IS YOUR POSITION WITH MFS?**

6 **A.** I am the Senior Director of External and Regulatory
7 Affairs for the Southern Region for MFS
8 Communications Company, Inc., the indirect parent
9 company of Metropolitan Fiber Systems of Florida.

10 I will collectively refer to MFSCC and its
11 subsidiaries as "MFS."

12 **Q. WHAT ARE YOUR RESPONSIBILITIES IN THAT POSITION?**

13 **A.** I am responsible for the regulatory oversight of
14 commission dockets and other regulatory matters and
15 serve as MFS's representative to various members of
16 the industry. I am also responsible for
17 coordinating co-carrier discussions with Local
18 Exchange Carriers within the Southern Region.

19 **Q. PLEASE DESCRIBE YOUR PREVIOUS PROFESSIONAL
20 EXPERIENCE AND EDUCATIONAL BACKGROUND.**

21 **A.** I have a B.S. in Political Science from Arizona
22 State University and an M.A. in Telecommunications
23 Policy from George Washington University. I began
24 work in the telecommunications industry in April

1 1982 as a sales representative for packet switching
2 services for Graphnet, Inc., one of the first value-
3 added common carriers in the United States. From
4 1983 until 1987, I was employed at Sprint
5 Communications Co., in sales, as a tariff analyst,
6 as a product manager, and as Manager of Product and
7 Market Analysis. During 1988, I worked at Contel
8 Corporation, a local exchange carrier, in its
9 telephone operations group, as the Manager of
10 Network Marketing. I have been working for MFS and
11 its affiliates since January 1989. During this time
12 period, I have worked in product marketing and
13 development, corporate planning, regulatory support,
14 and regulatory affairs. Most recently, from August
15 1994 until August 1995, I have been representing MFS
16 on regulatory matters before the New York,
17 Massachusetts, and Connecticut state commissions and
18 was responsible for the MFS Interim Co-Carrier
19 Agreements with NYNEX in New York and Massachusetts,
20 as well as the execution of a co-carrier Joint
21 Stipulation in Connecticut.

1 **Q. PLEASE DESCRIBE THE OPERATIONS OF MFS COMMUNICATIONS**
2 **COMPANY, INC. AND ITS SUBSIDIARIES**

3 **A.** MFS Communications Company, Inc. ("MFSCC") is a
4 diversified telecommunications holding company with
5 operations throughout the country, as well as in
6 Europe. MFS Telecom, Inc., an MFSCC subsidiary,
7 through its operating affiliates, is the largest
8 competitive access provider in the United States.
9 MFS Telecom, Inc.'s subsidiaries, including
10 MFS/McCourt, Inc., provide non-switched, dedicated
11 private line and special access services.

12 MFS Intelenet, Inc. ("MFSI") is another wholly
13 owned subsidiary of MFSCC. It causes operating
14 subsidiaries to be incorporated on a state-by-state
15 basis. MFSI's operating subsidiaries collectively
16 are authorized to provide switched interexchange
17 telecommunications services in 48 states and have
18 applications to offer such service pending in the
19 remaining states. Where so authorized, MFSI's
20 operating subsidiaries offer end users a single
21 source for local and long distance telecommuni-
22 cations services with quality and pricing levels
23 comparable to those achieved by larger

1 communications users. Apart from Florida, MFSI
2 subsidiaries have been authorized to provide
3 competitive local exchange service in seven states.
4 Since July 1993, MFS Intelenet of New York, Inc. has
5 offered local exchange services in competition with
6 New York Telephone Company. MFS Intelenet of
7 Maryland, Inc. was authorized to provide local
8 exchange services in competition with Bell Atlantic-
9 Maryland, Inc. in April 1994 and recently has
10 commenced operations. On June 22, 1994, MFS
11 Intelenet of Washington, Inc. was authorized to
12 provide local exchange services in competition with
13 US West Communications, Inc. On July 20, 1994, MFS
14 Intelenet of Illinois, Inc. was certificated to
15 provide local exchange services in competition with
16 Illinois Bell Telephone Company and Central
17 Telephone Company of Illinois. MFS Intelenet of
18 Ohio was certificated to provide competitive local
19 exchange service in competition with Ohio Bell on
20 August 3, 1995. MFS Intelenet of Michigan, on May
21 9, 1995, was certificated to provide competitive
22 local exchange service in competition with
23 Ameritech-Michigan. MFS Intelenet of Connecticut

1 was dedicated to provide local exchange service in
2 competition with Southern New England Telephone
3 Company on June 28, 1995. Finally, MFS Intelenet of
4 Massachusetts was certificated on March 9, 1994 to
5 operate as a reseller of both interexchange and
6 local exchange services in the Boston Metropolitan
7 Area in competition with New England Telephone.

8 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS**
9 **COMMISSION?**

10 **A.** Yes. On August 14, 1995, I filed direct testimony
11 in the universal service docket (docket no. 950696-
12 TP).

13 **Q. ARE ANY OF THE PARTIES UPON WHOSE BEHALF YOU ARE**
14 **TESTIFYING CURRENTLY CERTIFICATED TO PROVIDE SERVICE**
15 **IN FLORIDA?**

16 **A.** Yes. Metropolitan Fiber Systems of Florida, Inc.
17 was certificated as an Alternative Access Vendor
18 ("AAV") on February 24, 1993. By letter dated July
19 5, 1995, Metropolitan Fiber Systems of Florida
20 notified the Commission of its intent to provide
21 switched local exchange service in Florida.

1 I. PURPOSE AND SUMMARY

2 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS
3 PROCEEDING?

4 A. To set forth MFS's position on issues concerning the
5 implementation of temporary local telephone number
6 portability solutions in Florida. Temporary local
7 telephone number portability arrangements must be
8 available to all ALECs and LECs on an economically
9 viable basis if local exchange competition is to
10 develop in Florida. Any temporary local number
11 portability arrangement that arbitrarily assigns all
12 the costs of the arrangements to ALECs and their
13 customers is guaranteed to stifle the development of
14 local exchange competition in Florida. In order to
15 encourage the development of local exchange
16 competition in Florida, therefore, the Commission
17 should adopt a temporary solution that spreads the
18 costs evenly across the entire subscriber base,
19 thereby distributing the costs of portability across
20 all those who will reap the substantial benefits of
21 competition. This is the approach taken in
22 virtually every state that has adopted a temporary
23 number portability solution.

1 **Q. WHAT STATUTORY REQUIREMENTS HAS THE FLORIDA**
2 **LEGISLATURE IMPLEMENTED WITH RESPECT TO TEMPORARY**
3 **NUMBER PORTABILITY?**

4 **A.** The Florida Legislature recently passed S.B. 1554
5 which opens the Florida local exchange market to
6 competition. As an integral aspect of this policy,
7 Chapter 364.16(4), Florida Statutes, requires the
8 Commission to have a temporary service provider
9 number portability mechanism in place on January 1,
10 1996. The statute also requires industry
11 participants to form a number portability standards
12 group to develop the appropriate costs, parameters,
13 and standards for number portability, a group that
14 was formed on July 26, 1995. The group includes
15 representatives of potential local exchange
16 competitors in Florida, including MFS, and is tasked
17 to negotiate a temporary number portability
18 solution.

19 **Q. HAS THE GROUP SUCCEEDED IN NEGOTIATING A**
20 **COMPREHENSIVE NUMBER PORTABILITY SOLUTION?**

21 **A.** No. The parties have agreed to a Stipulation
22 addressing certain fundamental aspects of a
23 solutions, such as the basic technical alternatives

1 that must be offered. The parties have not,
2 however, been able to reach agreement on how the
3 cost of temporary number portability should be met.

4 **Q. WHAT WAS AGREED UPON IN THE STIPULATION?**

5 **A.** The parties agreed that Chapter 364.16(4), Florida
6 Statutes, requires a service provider temporary
7 number portability solution that will allow an end
8 user at a given location to change service from a
9 local exchange company ("LEC") to an alternative
10 local exchange company ("ALEC") and vice versa. The
11 parties also agreed that two forms of service
12 provider number portability should be made available
13 on January 1, 1996: Remote Call Forwarding and
14 Flexible or Flex DID. I will discuss these two
15 temporary number portability methods at greater
16 length later in my testimony. The parties also
17 agreed that they will use their best efforts to
18 ensure the successful integration of relevant ALEC
19 information into the existing 911/E911 systems. The
20 Stipulation did not reach the critical issue of how
21 the cost of temporary number portability will be
22 funded.

23 **Q. ON WHAT ISSUES WILL YOU FOCUS YOUR TESTIMONY?**

1 **A.** Pursuant to the recent Order Modifying Procedural
2 Schedule issued on August 28 in this docket, I will
3 focus on Issues 3 (advantages and disadvantages of
4 solutions), 4 (costs associated with providing each
5 solution), 5 (how costs should be recovered), and 8
6 (whether the docket should be closed).

7 **Q. IS SOME FORM OF LOCAL NUMBER PORTABILITY ESSENTIAL?**

8 **A.** Yes. Both MFS' customer surveys and its actual
9 experience in New York conclusively demonstrate that
10 customers are extremely reluctant to change
11 telephone carriers if it means they will also be
12 required to change telephone numbers. MFS has
13 conducted two series of surveys of potential
14 customers in New York that provide overwhelming
15 evidence of the significance of number portability
16 to customers considering switching to a competitive
17 provider. Surveys dated October 10, 1994 and April
18 6, 1995 attached as Exhibit A. In the 1994 Survey,
19 92% of customers surveyed said they would not
20 consider MFS Intelenet services without number
21 portability. In the 1995 survey, 98% of customers
22 said number portability was "very important" to
23 them. (The other 2% said number portability was at

1 least "somewhat important.") MFS has not seen in
2 Florida or elsewhere any market survey or other
3 evidence suggesting that number portability is not
4 critically important to customers.

5 Telephone subscribers act as if they own their
6 telephone numbers and are extremely reluctant to
7 change numbers unless absolutely necessary. This is
8 particularly true for businesses whose economic
9 well-being is tied to having a recognizable,
10 consistent phone number where they can be reached by
11 their customers on an ongoing basis. Many
12 businesses invest heavily in a given phone number in
13 the form of advertising, stationery and business
14 cards showing the telephone number. Changing phone
15 numbers therefore imposes not only substantial
16 inconvenience, but also the expense of reprinting
17 these written materials, as well as sending mailings
18 to customers and vendors notifying them of the new
19 number and the possibility of lost calls. This
20 entails direct expenses for printing and mailing,
21 and also diverts employee time from more productive
22 activities.

1 In addition, long term investment in
2 advertising a phone number that must later be
3 changed can never be recovered. Even a business
4 that might consider changing phone numbers once
5 would be even more reluctant to change numbers
6 again. Competition cannot thrive in an environment
7 characterized by this level of customer inertia, and
8 even the MLECs will benefit in the long run from a
9 system that would permit a customer to not only
10 switch providers freely, but to switch back as well.

11 This issue is particularly sensitive for the
12 generally underserved market of small business
13 customers, typically those having 5 to 35 lines.
14 These customers make up the economic backbone of
15 Florida, yet have generally received the worst
16 service and paid the highest prices of any class of
17 telephone users. They are also the customers to
18 whom, as a general matter, the ability to retain
19 existing telephone numbers is of the most critical
20 importance. These customers do not have sufficient
21 traffic volume to justify splitting their business
22 between two carriers, and they have often invested
23 substantial amounts of money in advertising and

1 publicizing their telephone numbers. In some lines
2 of business, incoming telephone calls are virtually
3 the only source of sales. The lack of a cost-
4 effective method to allow customers to retain their
5 telephone numbers would harm small businesses more
6 than any other class of customer. Because number
7 portability has been identified by customers as a
8 critical customer need, the Commission must
9 accommodate this need on both an interim and long-
10 term basis if it expects to establish a competitive
11 market.

12 **Q. HAVE OTHER STATES RECOGNIZED THE SIGNIFICANCE OF**
13 **NUMBER PORTABILITY?**

14 **A.** Every state that is implementing local exchange
15 competition is considering some form of interim
16 number portability. The New York Public Service
17 Commission recently issued an Order concluding that
18 "[n]umber portability will be essential to the
19 transition to a competitive local exchange market."
20 *Proceeding on Motion of the Commission to Examine*
21 *Issues Related to the Continued Provision of*
22 *Universal Service and to Develop a Framework for the*
23 *Transition to Competition in the Local Exchange*

1 Market, Case 94-C-0095. (Exhibit B hereto at 3).
2 The Commission ordered NYNEX and Rochester Telephone
3 Corporation to provide interim number portability,
4 including a broadbased sharing of costs I will
5 describe later in my testimony. The New York
6 Commission only required that this one option be
7 made available, but also encouraged carriers to
8 explore alternative solutions. All certificated
9 local exchange companies, including competitive
10 providers, were required to provide interim number
11 portability.

12 The Illinois Commerce Commission ("ICC") has
13 required that a variety of interim number
14 portability services be tariffed. *Illinois Bell*
15 *Telephone Company, Proposed introduction of a trial*
16 *of Ameritech's Customers First Plan in Illinois,*
17 Docket Nos. 94-0096 et al., Order (Ill. Comm.
18 Comm'n, April 7, 1995). Specifically, the ICC
19 required that Remote Call Forwarding, Enhanced
20 Remote Call Forwarding, DID Trunks, and FX Service
21 be made available to competitors "at cost-based
22 rates with only a reasonable level of contribution."

1 *Id.* at 110. (The Commission added that "we intend
2 to scrutinize the tariffs to ensure this." *Id.*)

3 In the MFS Intelenet of Maryland ("MFSI-MD")
4 certification proceeding, the Maryland Public
5 Service Commission required Bell Atlantic-Maryland
6 ("BA-MD") to make available a tariffed Flex DID
7 number portability solution, a solution that MFSI-MD
8 supported at the time but no longer endorses. Under
9 this system, MFSI-MD subscribes to BA-MD DID trunks
10 for the receipt of incoming calls to numbers that
11 its customers desired to retain. The service is
12 identical to BA-MD's existing DID offerings, but any
13 single telephone number that a customer desires to
14 switch to MFSI-MD can be designated as a DID number
15 (the BA-MD DID tariff only permits DID numbers to be
16 assigned in consecutive groups of 20 numbers).

17 **Q. WILL LOCAL EXCHANGE COMPETITION TAKE PLACE WITHOUT**
18 **INTERIM NUMBER PORTABILITY?**

19 **A.** Not to any significant extent because, as
20 demonstrated by the MFS surveys, few if any
21 customers will purchase service from competitive
22 local providers if they cannot retain their
23 telephone number. As other states have concluded,

1 postponing interim number portability is tantamount
2 to postponing the introduction of local competition.

3 **Q. HOW SHOULD LOCAL NUMBER PORTABILITY BE IMPLEMENTED?**

4 **A.** The Commission should consider both interim and
5 permanent solutions to this issue. While permanent
6 number portability arrangements are necessary to
7 eliminate the inequities imposed on new entrants by
8 temporary arrangements, MFS will focus in this
9 testimony on temporary solutions. MFS applauds the
10 Legislature's determination that temporary number
11 portability should be in place by January 1, 1996.
12 MFS proposes that the Commission should require the
13 MLECs to offer temporary local number portability
14 services using at least the currently available Co-
15 Carrier Call Forwarding method. Although there may
16 be other technical alternatives to Co-Carrier Call
17 Forwarding, Metropolitan Fiber Systems of Florida,
18 Inc. ("MFS") will focus on this solution to the
19 extent that it is the method preferred by MFS.

1 **Q. BASED ON MFS' EXPERIENCE IN NEW YORK, DO YOU BELIEVE**
2 **THAT WORKABLE INTERIM NUMBER PORTABILITY**
3 **ARRANGEMENTS CAN BE IMPLEMENTED AT THIS TIME?**

4 **A. Yes. MFS has successfully completed trials of its**
5 **preferred interim solution, Co-Carrier Call**
6 **Forwarding ("CCF"), a remote call forwarding-based**
7 **solution, in New York, (with both NYNEX and**
8 **Rochester Telephone) and I would like to take this**
9 **opportunity to describe this experience. The New**
10 **York Public Service Commission and Pacific Bell have**
11 **also endorsed CCF as the best interim solution. The**
12 **MFSI/NYNEX interim Agreements in New York and**
13 **Massachusetts also provide for CCF as an interim**
14 **solution.**

15 **Q. BRIEFLY, HOW DOES CO-CARRIER CALL FORWARDING WORK?**

16 **A. CCF works within the constraints of the existing**
17 **numbering system, under which numbers must be**
18 **associated with a specific LEC central office.**
19 **Under the CCF approach as it is presently used in**
20 **New York, MFS Intelenet assigns a new telephone**
21 **number in its own NXX code corresponding to each**
22 **NYNEX telephone number that it will retain. NYNEX**
23 **then forwards calls from the old telephone number to**

1 the new number over the same trunks used for co-
2 carrier traffic exchange. The advantage of CCF is
3 that inefficient trunk groups between the new
4 entrant's switch and the incumbent's end offices can
5 be eliminated. Forwarded calls can be routed
6 through the tandem switch over common trunk groups.
7 Signaling can be either in-band or out-of-band SS7.
8 The Automatic Number Identification ("ANI") that is
9 out-pulsed when the customer places a call is the
10 new number which is transparent to the customer.
11 The MLEC will update its Line Identification
12 Database ("LIDB") listings for redirected telephone
13 numbers and cancel MLEC calling cards associated
14 with such numbers.

15 **Q. WHAT ARE SOME OF THE DISADVANTAGES OF CCF?**

16 **A.** Unfortunately, CCF and other interim number
17 portability solutions require that all calls be
18 routed to the MLEC switch before they can be
19 forwarded to MFS, a process that results in
20 additional transmission and switching expense and
21 call set-up time. It also appears that BLV/I and
22 some CLASS features are not available when utilizing
23 CCF.

1 Q. IS CCF STILL THE BEST INTERIM SOLUTION IN YOUR VIEW
2 DESPITE THESE DEFICIENCIES?

3 A. Yes.

4 Q. WHAT ARE THE ADVANTAGES OF CCF THAT MAKE IT THE BEST
5 INTERIM SOLUTION?

6 A. Although CCF is not technically optimal, as cited
7 above, the several state commissions, LECs, and MFSI
8 have agreed that CCF is the best interim solution
9 available. CCF provides the critical function of
10 permitting end users to change local service
11 providers while retaining their existing telephone
12 number, with virtually no impact to the incumbent
13 LEC's customer base and network. Like any interim
14 system, CCF is not perfect, and while a better
15 interim solution may come about, it is in MFS's view
16 the best currently available interim solution.

17 Q. ON BALANCE, DO THE BENEFITS OF INTERIM NUMBER
18 PORTABILITY OUTWEIGH THE LIMITED COSTS?

19 A. Yes. The costs are very limited. MFS has clearly
20 demonstrated that number portability at a reasonable
21 price is essential to the development of
22 competition, because customers simply may not be
23 inclined to subscribe to ALEC services if they

1 cannot retain their current phone numbers. Florida
2 can ill afford to put local competition on hold
3 while other states forge ahead with interim number
4 portability solutions. The State will lose
5 infrastructure investment to other states, and
6 significant economic development dollars to New
7 York, Illinois, Washington, Michigan, Ohio,
8 Connecticut, Pennsylvania, Maryland and other states
9 that are rapidly adopting competitive local markets.
10 Florida must also compete with neighboring Southern
11 states, as competition is rapidly sweeping
12 throughout the South: Georgia, North Carolina,
13 Tennessee, Kentucky, and Virginia, among others, are
14 currently addressing local competition issues in
15 proceedings similar to this one. Delay would also
16 be inconsistent with the Commission's and the
17 Legislature's commitment to implementing
18 competition.

1 **Q. DO YOU BELIEVE THAT FLEX DID SHOULD ALSO BE**
2 **AVAILABLE IF OTHER PARTIES REQUEST IT?**

3 **A. Yes. MFS believes that all technically and**
4 **economically feasible alternatives should be**
5 **available if there is demand for them. MFS is only**
6 **focusing its testimony on the CCF solution because**
7 **it is the Company's preferred method.**

8 **Q. ON WHAT TERMS SHOULD CO-CARRIER NUMBER FORWARDING BE**
9 **MADE AVAILABLE BY MLECS?**

10 **A. The Commission should establish the basic terms**
11 **under which CCF will be made available to all**
12 **carriers. Any number retention option should be**
13 **offered on terms that do not interfere with other**
14 **co-carrier arrangements, such as reciprocal**
15 **compensation and meet point billing tandem**
16 **subtending arrangements. Number retention options**
17 **will also be of limited utility if they impose**
18 **financial penalties on either competing carriers or**
19 **consumers.**

20 **Q. WHAT IS MFS' POSITION ON THE FUNDING OF INTERIM**
21 **NUMBER PORTABILITY?**

22 **A. Additional costs that result from the provision of**
23 **interim number portability arrangements, such as the**

1 potential cost of double switching calls initially
2 routed to MLEC end offices, should be recovered from
3 the general body of all ratepayers on a non-
4 discriminatory basis. This burden should be spread
5 evenly throughout the rate base because all
6 telecommunications users benefit from the existence
7 of a seamless public switched network with the
8 capability of providing number portability.

9 The Commission, as a matter of public policy,
10 has found that competition would be beneficial for
11 all telephone customers in Florida -- not just for
12 competitive providers or their customers. The
13 burden of funding the interim number portability
14 solutions necessary for that competition to develop
15 must therefore be shared by all who benefit from
16 that competition -- all Florida telephone users.
17 Again, other states that have addressed this issue,
18 such as New York and Michigan, have established
19 mechanisms that would spread the funding of number
20 portability evenly.

1 Q. WHAT MECHANISM DO YOU PROPOSE TO FUND INTERIM NUMBER
2 PORTABILITY?

3 A. MFS recommends a mechanism based on that recently
4 adopted in New York State and ordered by the New
5 York Public Service Commission in its Order of March
6 8, 1995, the Rochester Telephone Open Market Plan.
7 Case 94-C-0095, *Competition 2 Proceeding, Order*
8 *Requiring Interim Number Portability Directing a*
9 *Study of the Feasibility of a Trial of True Number*
10 *Portability and Directing Further Collaboration,*
11 (N.Y.P.S.C., March 8, 1995). See copy attached as
12 Exhibit B hereto. No charge would be imposed on the
13 number forwarded, but an annual surcharge on all
14 MLEC-assigned numbers would be assessed based upon
15 the product of total minutes of calls forwarded and
16 incremental costs of switching. (For Rochester, the
17 incremental cost of switching is approximately 0.5¢-
18 0.6¢). For example, if MFS were retaining 500
19 BellSouth numbers in a geographic area comprising
20 20,000 numbers, then MFS should be assessed
21 500/20000 or 2.5 percent of the BellSouth costs
22 associated with interim number portability in that
23 area.

1 Interim number portability funding, however,
2 should not be confused with compensation mechanisms:
3 interim number portability is a technical solution
4 to a key obstacle to implementing competition, but
5 it is not a mechanism to redistribute compensation
6 between providers. New entrants and their end-users
7 should therefore not pay a disproportionate share of
8 the burden of providing interim number portability.
9 Switched access and local compensation should apply
10 regardless of whether a call is completed using
11 interim number portability. MFS believes that this
12 is the only approach consistent with the
13 Commission's goal of introducing competition in the
14 local exchange market.

15 **Q. WOULD THE MLECS STIPULATE TO THE PRINCIPLE THAT**
16 **ACCESS CHARGES AND LOCAL COMPENSATION MUST BE PASSED**
17 **THROUGH TO THE CUSTOMER'S CARRIER WHEN INTERIM**
18 **NUMBER PORTABILITY ARRANGEMENTS ARE IMPLEMENTED?**

19 **A. No. The MLECs would not agree to this principle in**
20 the Stipulation.

1 Q. WHICH CARRIER SHOULD COLLECT THE CHARGES FOR
2 TERMINATION OF TRAFFIC ON ITS NETWORK WHEN A CALL IS
3 RECEIVED VIA NUMBER RETENTION?

4 A. Only if the customers' carrier collects these
5 revenues will competition be stimulated by interim
6 number portability. Allowing the incumbent LEC to
7 retain toll access charges for calls terminated to a
8 retained number belonging to a customer of another
9 carrier would have three adverse consequences.
10 First, it would reward the incumbent LEC for the
11 lack of true local number portability, and therefore
12 provide a financial incentive to delay true number
13 portability for as long as possible. Second, it
14 would help reinforce the incumbent LEC bottleneck on
15 termination of interexchange traffic, and thereby
16 stifle potential competition in this market. Third,
17 it would impede local exchange competition by
18 preventing new entrants from competing for one
19 significant component of the revenues associated
20 with that service, namely toll access charges.

21 MFS does not subscribe to the LEC conventional
22 wisdom that access charges "subsidize" local
23 exchange service, since there is no evidence that

1 the forward-looking economic cost of the basic local
2 exchange service exceeds its price as a general
3 matter (aside from special circumstances such as
4 Lifeline, where a subsidy may exist). Nonetheless,
5 access charges clearly provide a significant source
6 of revenue -- along with subscriber access charges,
7 local flat-rate or usage charges, intraLATA toll
8 charges, vertical feature charges, and perhaps
9 others -- that justify the total cost of
10 constructing and operating a local exchange network,
11 including shared and common costs. It is
12 unrealistic to expect new entrants to make the
13 substantial capital investment required to construct
14 and operate competitive networks if they will not
15 have the opportunity to compete for all of the
16 services provided by the LECs and all of the
17 revenues generated by those services. As long as
18 true local number portability does not exist, the
19 new entrants' opportunity to compete for access
20 revenue would be severely restricted if they had to
21 forfeit access charges in order to use interim
22 number portability arrangements.

1 **Q. SHOULD COMPENSATION ARRANGEMENTS FOR THE EXCHANGE OF**
2 **LOCAL OR TOLL TRAFFIC BETWEEN LECS VARY DEPENDING ON**
3 **WHETHER INTERIM NUMBER PORTABILITY WAS IN PLACE ON A**
4 **GIVEN CALL?**

5 **A. No. Temporary number portability is a technical**
6 arrangement that will permit competition to take
7 root in Florida. The purpose of temporary number
8 portability is to permit new entrants to market
9 their services to customers by permitting customers
10 to retain their phone numbers when switching to a
11 new provider. Because it is necessary to bring to
12 the public the benefits of competition at this time,
13 temporary number portability benefits all callers,
14 and has absolutely nothing to do with compensation.
15 These issues should not be mixed, and compensation
16 should not vary depending on whether temporary
17 number portability is in place or not.

18 **Q. WHAT COMPENSATION ARRANGEMENT SHOULD APPLY TO**
19 **REDIRECTED CALLS UNDER TEMPORARY NUMBER PORTABILITY?**

20 **A. The four major LECS (Southern Bell, General**
21 Telephone, Sprint Centel, and Sprint United)
22 ("MLECs") should compensate the new entrant as if
23 the traffic had been terminated directly to the new

1 entrant's network, except that certain transport
2 elements should not be paid to the new entrant to
3 the extent that the MLECs will be transporting the
4 call on their own networks. Thus, for LATA-wide
5 calls originating on the MLEC networks and
6 terminating on the new entrant's network, the
7 effective inter-carrier compensation structure at
8 the time the call is placed should apply. Traffic
9 from IXCs forwarded to the new entrant via the
10 temporary number portability service should be
11 compensated by the MLECs at the appropriate
12 intraLATA, interLATA-intrastate, or interstate
13 terminating access rate less those transport
14 elements corresponding to the use of the MLECs
15 network to complete the call. In other words, MLECs
16 should receive entrance fees, tandem switching, and
17 part of the tandem transport charges. The new
18 entrant should receive local switching, residual
19 interconnection charge, Carrier Common Line charges,
20 and part of the transport charge. (The pro-rata
21 billing share to be remitted to the new entrant
22 should be identical to the rates and rate levels as
23 non-temporary number portability calls.) The MLECs

1 will bill and collect from the interexchange carrier
2 and remit the appropriate portion to the new
3 entrant.

4 **Q. SHOULD THIS DOCKET BE CLOSED IMMEDIATELY AFTER THE**
5 **PROPOSED SCHEDULE CONCLUDES?**

6 **A.** No. Even if there is agreement or a Commission
7 solution to the question of temporary number
8 portability, the experience of MFS in New York in
9 other states suggests that there will additional
10 problems in implementation. These could include,
11 for example, differences of interpretation of the
12 requirements, or unanticipated technical issues.
13 Moreover, additional temporary solutions could arise
14 that were not contemplated at this time. Given the
15 market dominance of the MLECs, the Commission should
16 keep this docket open as a vehicle to address these
17 issues.

18 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

19 **A.** Yes.

**CERTIFICATE OF SERVICE
DOCKET NO. 950737-TP**

I hereby certify that on this 10th day of October 1995, copies of the corrected version of Direct Testimony of Timothy Devine On Behalf Of Metropolitan Fiber Systems of Florida, Inc. were served by first-class mail on the following:

Laurie A. Maffett
Manager, Regulatory Matters
Frontier Communications of the
South, Inc.
Frontier Telephone Group
180 South Clinton Avenue
Rochester, NY 14646-0400

F. B. (Ben) Poag
Sprint/United-Florida
Sprint/Centel-Florida
555 Lake Border Drive
Apopka, Florida 32716

Robert M. Post, Jr.
Indiantown Telephone System, Inc.
16001 Southwest Market St.
Indianatown, FL 34956-0277

Beverly Y. Menard
c/o Richard M. Fletcher
GTE Florida Incorporated
106 East College Avenue
Suite 1440
Tallahassee, FL 32301-7704

John A. Carroll, Jr.
Northeast Florida Telephone
Company, Inc.
P. O. Box 485
Macclenny, FL 32063-0485

Ferrin Seay
The Florala Telecommunications Co.
522 N. 5th Street
P. O. Box 186
Florala, AL 36442-0186

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Irvin
305 S. Gadsden St.
P. O. Drawer 1170
Tallahassee, FL 32302

Daniel V. Gregory
Quincy Telephone Company
107 W. Franklin Street
P. O. Box 189
Quincy, FL 32353-0189

John H. Vaughan
St. Joseph Telephone &
Telegraph Co.
502 Fifth St.
Port St. Joe, FL 32456-0220

Richard D. Melson
Hopping Green Sams & Smith
123 S. Calhoun Street
P. O. Box 6526
Tallahassee, FL 32301

Michael Tye
AT&T Communications of the
Southern States, Inc.
106 E. College Avenue
Suite 1410
Tallahassee, FL 32301-7733

Florida Interexchange Carriers
Association
c/o J.P. Gillan & Associates
P. O. Box 541038
Orlando, FL 32854-1038

Gina M. Lee
Hayes Telecommunications
Services, Inc.
1311-A Paul Russell Road
Suite 201
Tallahassee, FL 32301

Lee McDowell
Hyperion Telecommunications
of Florida, Inc.
5 W. 3rd Street
Coudersport, PA 16915

Donald D. Bowden
Gulf Telecommunications
P. O. Box 1120
Perry, FL 32347

Susan C. Langston
Florida Telephone Association
P. O. Box 1776
Tallahassee, FL 32302

Tony H. Key, Director
State Regulatory-South
Sprint
3100 Cumberland Circle
Atlanta, GA 30339

J. Phillip Carver
Robert G. Beatty
c/o Nancy H. Sims
Southern Bell Telephone &
Telegraph Co.
150 S. Monroe Street
Suite 400
Tallahassee, FL 32301

Richard H. Brashear
Harriet Eudy
ALLTEL Florida, Inc.
206 White Avenue
P. O. Box 550
Live Oak, FL 32060

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

Angela Green
Florida Public
Telecommunications Assn.
125 S. Gadsden St.
#200
Tallahassee, FL 32301-1525

William H. Higgins, Esq.
McCaw Cellular Communications, Inc.
c/o Cellular One
250 S. Australian Avenue
Suite 900
West Palm Beach, FL 33401

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Goldman & Metz, P.A.
215 S. Monroe Street, Ste. 701
P. O. Box 1876
Tallahassee, FL 32301

American Communications
Network Incorporated
919 Third Avenue
Suite 620
New York, NY 10022

Lynn B. Hall
Vista-United Telecommunications
3100 Bonnet Creek Road
Lake Buena Vista, FL 32830

Peter M. Dunbar, Esq.
Charles W. Murphy, Esq.
Pennington & Haben, P.A.
215 S. Monroe Street
2nd Floor
P. O. Box 10095
Tallahassee, FL 32301

Anthony P. Gillman
Kimberly Caswell
GTE Florida Incorporated
One Tampa City Center
201 N. Franklin Street
P. O. Box 110, FLTC0007
Tampa, FL 33602

Marsha Rule
Wiggins and Villacorta
501 E. Tennessee St.
Suite B
Tallahassee, FL 32302

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
501 E. Tennessee St., Suite B
Tallahassee, FL 32302

Jacksonville Teleport, L.C.
2516 Edison Avenue
Jacksonville, FL 32204-2530

Laura L. Wilson, Esq.
Charles F. Dudley, Esq.
Florida Cable
Telecommunications
Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

David B. Erwin
Young, Van Assenderp
Varnadoe & Benton, P.A.
225 S. Adams Street
Suite 200
Tallahassee, FL 32301

Charles Beck
Office of Public Counsel
House of Representatives
The Capitol
Tallahassee, FL 32301

Lee L. Willis
J. Jeffrey Wahlen
Ausley, McMullen, McGehee
Carothers & Proctor
227 S. Calhoun Street
Tallahassee, FL 32301

Alan N. Berg
United Telephone Company
Central Telephone Company
555 Lake Border Drive
Apopka, FL 32703

Timothy T. Devine
MFS Intelenet, Inc.
250 Williams Street
Suite 2200
Atlanta, GA 30303

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

Dewayne Lanier
Gulf Telephone
115 West Drew Street
Perry, FL 32347

John McGlew
Northeast Florida Telephone Company
130 N. 4th Street
MacClenny, FL 32063

Charles L. Dennis
Indiantown Telecommunications System,
Inc.
15925 S.W. Warfield Boulevard
Indiantown, FL 34956

James W. Tyler
Vista-United Telecommunications
3100 Bonnet Creek Road
Lake Buena Vista, FL 32830

John Vaughan
St. Joseph Telephone and
Telegraph Co.
502 5th Street
Port St. Joe, FL 32456

Michael W. Tye
AT&T
106 E. College Avenue
Suite 1410
Tallahassee, FL 32301

AMNEX
Regulatory Affairs
101 Park Avenue
Suite 2507
New York, NY 10178

Robin Dunson
AT&T Communications
of the Southern States, Inc. (GA)
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309-7733

Thomas Beard
Beard and Associates
5364 Appledore Lane
Tallahassee, FL 32308

BellSouth Mobility, Inc.
1100 Peachtree Street, N.E.
Suite 14-E06
Atlanta, Georgia 30309-4599

Gary T. Lawrence
City of Lakeland
501 East Lemon St.
Lakeland, FL 33801

J.D. Thomas
Cole Law Firm
1919 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Greg Krasovsky
Commerce & Economic
Opportunities
State Senate
426 Senate Office Building
Tallahassee, FL 32399

Data & Electronic Services, Inc.
P. O. Box 1585
Destin, FL 32540-1585

Carolyn Mason
Department of Management
Services
4050 Esplanade Way
Building 4030
Tallahassee, FL 32399

Nels Roseland
Office of Planning and Budget
The Capitol, Room 1502
Tallahassee, FL 32399

Bruce May
Holland Law Firm
P. O. Drawer 810
Tallahassee, FL 32302

Sam LaMartina
Independent Telecommunications
Network, Inc.
8500 W. 110th Street
Suite 600
Overland Park, KS 66210

Vice President, External Affairs
Intermedia Communications
of Florida, Inc. (TI857)
9280 Bay Plaza Blvd., Ste. 720
Tampa, Florida 33619

David Hickman
International Speedway Corp.
P. O. Box 2801
Daytona Beach, FL 32120

Don Price
MCI Telecommunications
701 Brazos, Suite 600
Austin, TX 78701

Woody Taylor
MCI Telecommunications
2400 N. Glenville Drive
Dept. 0415
Richardson, TX 75082

Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street
Room 812
Tallahassee, FL 32399

Payphone Consultants, Inc.
3431 N.W. 55th Street
Ft. Lauderdale, FL 33309

Kenneth Hoffman
Rutledge Law Firm
P. O. Box 551
Tallahassee, FL 32302

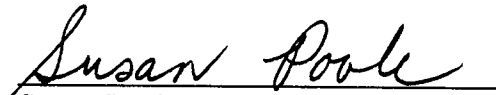
Suncoast Payphone Company
7916 Edinburgh Drive
New Port Richey, FL 34653

Margaret Weaver
Tampa Payphones, Inc.
P. O. Box 291805
Tampa, FL 33687

Jodie Donovan
TCG South Florida
1133 21st Street, N.W.
Suite 400
Washington, D.C. 20036

Andrew Isar
Telecommunications Reseller Assn.
4312 92nd Avenue, N.W.
Gig Harbor, WA 98335

Clay Phillips
Utilities and Telecommunications
State House
410 House Office Building
Tallahassee, FL 32399


Susan Poole

**CERTIFICATE OF SERVICE
DOCKET NO. 950737-TP**

I hereby certify that on this 10th day of October 1995, copies of the corrected version of Direct Testimony of Timothy Devine On Behalf Of Metropolitan Fiber Systems of Florida, Inc. were served by first-class mail on the following:

Laurie A. Maffett
Manager, Regulatory Matters
Frontier Communications of the
South, Inc.
Frontier Telephone Group
180 South Clinton Avenue
Rochester, NY 14646-0400

F. B. (Ben) Poag
Sprint/United-Florida
Sprint/Centel-Florida
555 Lake Border Drive
Apopka, Florida 32716

Robert M. Post, Jr.
Indiantown Telephone System, Inc.
16001 Southwest Market St.
Indianatown, FL 34956-0277

Beverly Y. Menard
c/o Richard M. Fletcher
GTE Florida Incorporated
106 East College Avenue
Suite 1440
Tallahassee, FL 32301-7704

John A. Carroll, Jr.
Northeast Florida Telephone
Company, Inc.
P. O. Box 485
Macclenny, FL 32063-0485

Ferrin Seay
The Florida Telecommunications Co.
522 N. 5th Street
P. O. Box 186
Floral, AL 36442-0186

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Irvin
305 S. Gadsden St.
P. O. Drawer 1170
Tallahassee, FL 32302

Daniel V. Gregory
Quincy Telephone Company
107 W. Franklin Street
P. O. Box 189
Quincy, FL 32353-0189

John H. Vaughan
St. Joseph Telephone &
Telegraph Co.
502 Fifth St.
Port St. Joe, FL 32456-0220

Richard D. Melson
Hopping Green Sams & Smith
123 S. Calhoun Street
P. O. Box 6526
Tallahassee, FL 32301

Michael Tye
AT&T Communications of the
Southern States, Inc.
106 E. College Avenue
Suite 1410
Tallahassee, FL 32301-7733

Florida Interexchange Carriers
Association
c/o J.P. Gillan & Associates
P. O. Box 541038
Orlando, FL 32854-1038

Gina M. Lee
Hayes Telecommunications
Services, Inc.
1311-A Paul Russell Road
Suite 201
Tallahassee, FL 32301

Lee McDowell
Hyperion Telecommunications
of Florida, Inc.
5 W. 3rd Street
Coudersport, PA 16915

Donald D. Bowden
Gulf Telecommunications
P. O. Box 1120
Perry, FL 32347

Susan C. Langston
Florida Telephone Association
P. O. Box 1776
Tallahassee, FL 32302

Tony H. Key, Director
State Regulatory-South
Sprint
3100 Cumberland Circle
Atlanta, GA 30339

J. Phillip Carver
Robert G. Beatty
c/o Nancy H. Sims
Southern Bell Telephone &
Telegraph Co.
150 S. Monroe Street
Suite 400
Tallahassee, FL 32301

Richard H. Brashear
Harriet Eudy
ALLTEL Florida, Inc.
206 White Avenue
P. O. Box 550
Live Oak, FL 32060

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

Angela Green
Florida Public
Telecommunications Assn.
125 S. Gadsden St.
#200
Tallahassee, FL 32301-1525

William H. Higgins, Esq.
McCaw Cellular Communications, Inc.
c/o Cellular One
250 S. Australian Avenue
Suite 900
West Palm Beach, FL 33401

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Goldman & Metz, P.A.
215 S. Monroe Street, Ste. 701
P. O. Box 1876
Tallahassee, FL 32301

American Communications
Network Incorporated
919 Third Avenue
Suite 620
New York, NY 10022

Lynn B. Hall
Vista-United Telecommunications
3100 Bonnet Creek Road
Lake Buena Vista, FL 32830

Peter M. Dunbar, Esq.
Charles W. Murphy, Esq.
Pennington & Haben, P.A.
215 S. Monroe Street
2nd Floor
P. O. Box 10095
Tallahassee, FL 32301

Anthony P. Gillman
Kimberly Caswell
GTE Florida Incorporated
One Tampa City Center
201 N. Franklin Street
P. O. Box 110, FLTC0007
Tampa, FL 33602

Marsha Rule
Wiggins and Villacorta
501 E. Tennessee St.
Suite B
Tallahassee, FL 32302

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
501 E. Tennessee St., Suite B
Tallahassee, FL 32302

Jacksonville Teleport, L.C.
2516 Edison Avenue
Jacksonville, FL 32204-2530

Laura L. Wilson, Esq.
Charles F. Dudley, Esq.
Florida Cable
Telecommunications
Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

David B. Erwin
Young, Van Assenderp
Varnadoe & Benton, P.A.
225 S. Adams Street
Suite 200
Tallahassee, FL 32301

Charles Beck
Office of Public Counsel
House of Representatives
The Capitol
Tallahassee, FL 32301

Lee L. Willis
J. Jeffrey Wahlen
Ausley, McMullen, McGehee
Carothers & Proctor
227 S. Calhoun Street
Tallahassee, FL 32301

Alan N. Berg
United Telephone Company
Central Telephone Company
555 Lake Border Drive
Apopka, FL 32703

Timothy T. Devine
MFS Intelenet, Inc.
250 Williams Street
Suite 2200
Atlanta, GA 30303

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

Dewayne Lanier
Gulf Telephone
115 West Drew Street
Perry, FL 32347

John McGlew
Northeast Florida Telephone Company
130 N. 4th Street
MacClenny, FL 32063

Charles L. Dennis
Indiantown Telecommunications System,
Inc.
15925 S.W. Warfield Boulevard
Indiantown, FL 34956

James W. Tyler
Vista-United Telecommunications
3100 Bonnet Creek Road
Lake Buena Vista, FL 32830

John Vaughan
St. Joseph Telephone and
Telegraph Co.
502 5th Street
Port St. Joe, FL 32456

Michael W. Tye
AT&T
106 E. College Avenue
Suite 1410
Tallahassee, FL 32301

AMNEX
Regulatory Affairs
101 Park Avenue
Suite 2507
New York, NY 10178

Robin Dunson
AT&T Communications
of the Southern States, Inc. (GA)
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309-7733

Thomas Beard
Beard and Associates
5364 Appledore Lane
Tallahassee, FL 32308

BellSouth Mobility, Inc.
1100 Peachtree Street, N.E.
Suite 14-E06
Atlanta, Georgia 30309-4599

Gary T. Lawrence
City of Lakeland
501 East Lemon St.
Lakeland, FL 33801

J.D. Thomas
Cole Law Firm
1919 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Greg Krasovsky
Commerce & Economic
Opportunities
State Senate
426 Senate Office Building
Tallahassee, FL 32399

Data & Electronic Services, Inc.
P. O. Box 1585
Destin, FL 32540-1585

Carolyn Mason
Department of Management
Services
4050 Esplanade Way
Building 4030
Tallahassee, FL 32399

Nels Roseland
Office of Planning and Budget
The Capitol, Room 1502
Tallahassee, FL 32399

Bruce May
Holland Law Firm
P. O. Drawer 810
Tallahassee, FL 32302

Sam LaMartina
Independent Telecommunications
Network, Inc.
8500 W. 110th Street
Suite 600
Overland Park, KS 66210

Vice President, External Affairs
Intermedia Communications
of Florida, Inc. (TI857)
9280 Bay Plaza Blvd., Ste. 720
Tampa, Florida 33619

David Hickman
International Speedway Corp.
P. O. Box 2801
Daytona Beach, FL 32120

Don Price
MCI Telecommunications
701 Brazos, Suite 600
Austin, TX 78701

Woody Taylor
MCI Telecommunications
2400 N. Glenville Drive
Dept. 0415
Richardson, TX 75082

Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street
Room 812
Tallahassee, FL 32399

Payphone Consultants, Inc.
3431 N.W. 55th Street
Ft. Lauderdale, FL 33309

Kenneth Hoffman
Rutledge Law Firm
P. O. Box 551
Tallahassee, FL 32302


Suncoast Payphone Company
7916 Edinburgh Drive
New Port Richey, FL 34653

Margaret Weaver
Tampa Payphones, Inc.
P. O. Box 291805
Tampa, FL 33687

Jodie Donovan
TCG South Florida
1133 21st Street, N.W.
Suite 400
Washington, D.C. 20036

Andrew Isar
Telecommunications Reseller Assn.
4312 92nd Avenue, N.W.
Gig Harbor, WA 98335

Clay Phillips
Utilities and Telecommunications
State House
410 House Office Building
Tallahassee, FL 32399


Susan Poole