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October 11, 1990

Mr. Steve Tribble
 Director, Division of Records and Reporting
 Florida Public Service Commission
 101 East Gaines Street
 Tallahassee, Florida 32304

Re: Docket No. 900644-TP

Dear Mr. Tribble:

Attached are the ATC Long Distance's comments regarding the proposed Amendment of Rule 25-4.0161, F.A.C., Regulatory Assessment Fees for Telephone Companies, (Docket No. 900644-TP). Please insert this into the record of this docket.

Thank you for your attention.

Sincerely,

Brian K. Sulmonetti
 Manager Regulatory Affairs

BKS/mjm
 enclosure

- ACK _____
- AFA 1
- APP 1
- CAF _____
- CMU 1
- CTR _____
- EAG _____
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DOCUMENT NUMBER-DATE

09205 OCT 15 1990

PSC-RECORDS/REPORTING

Before the
FLORIDA PUBLIC SERVICE COMMISSION

In re: Amendment of Rule 25-4.0161)
F.A.C., Regulatory Assessment Fees)
for Telephone Companies)
_____)

DOCKET NO. 900644-TP
FILED: October -, 1990

COMMENTS OF ATC LONG DISTANCE

1 Pursuant to Order No. 23577 in Docket No. 900644-TP issued
2 on October 4, 1990, ATC Long Distance ("ATC") files the following
3 comments on the proposed Amendment of Rule 25-4.0161 F.A.C.
4

5 ATC believes that Rule 25-4.0161 F.A.C. should allow for the
6 deduction of resold interexchange services of another Florida
7 certified company, in determining the regulatory assessment fee.
8 Back in late 1986, the Commission reviewed this very issue
9 however, ATC believes it has not been brought to proper closure.
10 See attachment A for an example of what ATC is proposing (This
11 example was part of Staff's 1986 memorandum). This would prevent
12 any double-dipping by the regulatory assessment fee and puts the
13 fee on a value added basis. The proposal is similar to allowing
14 the IXCs to deduct intrastate access charges from gross
15 intrastate revenues; since the Commission already collects an
16 assessment fee on those access revenues from the local exchange
17 company.
18

DOCUMENT NUMBER-DATE

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-PSC-RECORDS/REPORTING

REGULATORY ASSESSMENT FEECURRENT PROCEDURE

<u>CENDEL</u>		<u>LIGHTNET</u>		<u>MCI</u>	
Local Revenue	\$ 90	Lease Revenue	\$ 50	Toll Revenue	\$ 75
WATS Revenue	5	from MCI		Deduct Access Exp.	
from MCI		Deduct Sales		to Centel	5
WATS Revenue	10	for Resale	50	WATS Expense	70*
from end users			\$ 0*	to Centel	5
Access Revenue				Lease Expense	
from MCI	5			to Lightnet	50
	<u>\$110*</u>				<u>\$ 15</u>

PROPOSED PROCEDURE

<u>CENDEL</u>		<u>LIGHTNET</u>		<u>MCI</u>	
Local Revenue	\$ 90	Lease Revenue	\$ 50*	Toll Revenue	\$ 75
WATS Revenue	5	from MCI		Deduct Access	
from MCI				Expense to	
WATS Revenue	10			Centel	5
from end users				Deduct WATS	
Access Revenue				Expense to	
from MCI	5			Centel	5
	<u>\$110*</u>			Deduct Lease	
				Expense to	
				Lightnet	50
					<u>\$ 15*</u>

*Regulatory Assessment Fee Applies
0600C(10)