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AT&T

Michael W. Tye
Senior Attorney

Suite 1400
106 East College Avenue
Tallahassee, Florida 32301
904 425-6360

June 3, 1991

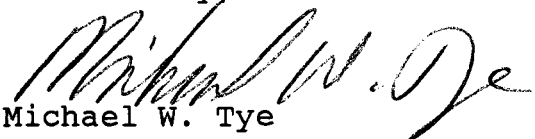
Mr. Steven C. Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399

Re: Docket No. 870790-TL

Dear Mr. Tribble:

Enclosed for filing in the above referenced docket are one (1) original and fifteen (15) copies of the AT&T's Prehearing Statement. Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Yours truly,


Michael W. Tye

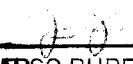
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Attachments

cc: J. P. Spooner, Jr.

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU
- CTR _____
- EAG _____
- LEG 1
- LIN 6
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

05568 JUN -3 1991

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Extended)
Area Service (EAS) throughout)
Gilchrist County)
_____)

Docket No. 870790-TL
Submitted for Filing:
June 3, 1991

AT&T'S PREHEARING STATEMENT

AT&T Communications of the Southern States, Inc. (hereinafter "AT&T"), pursuant to Rule 25-22.038, Florida Administrative Code, and Order No. 24257, issued March 20, 1991 by the Florida Public Service Commission (hereinafter "the Commission") in the above-referenced docket, hereby submits its Prehearing Statement.

A. Witnesses

AT&T does not intend to sponsor the testimony of any witnesses in this proceeding. However, in the event that there are matters raised by the parties for the first time at the hearing, AT&T reserves the right to present responsive testimony, if necessary.

B. Exhibits

AT&T does not intend to present any exhibits. However, in the event that there are matters raised by the parties for the first time at the hearing, AT&T reserves the right to submit responsive exhibits, if necessary.

DOCUMENT NUMBER-DATE

05568 JUN-3 1991

FPSC-RECORDS/REPORTING

C. Basic Position

Three of the proposed EAS routes in this case - Bradford to Trenton, High Springs to Trenton, and Bradford to Newberry - would cross an established LATA boundary. AT&T submits that implementation of the proposed EAS on those interLATA routes is not in the public interest inasmuch as it would result in higher toll costs for other interLATA customers. The solution to the calling problems which may be faced by residents of Gilchrist County lies in reducing the access charges which interexchange carriers incur in the completion of interexchange calls. Reduction of such charges will lead to appropriate reductions in long distance rates thereby making calling more affordable between the affected communities.

D. Fact Issues

See AT&T's Positions on Issues.

E. Legal Issues

See AT&T's Positions on Issues.

F. Policy Issues

See AT&T's Positions on Issues.

G. Position on Issues

See AT&T's Positions on Issues.

H. Stipulated Issues

AT&T is not aware of any issues which have been stipulated to by the parties.

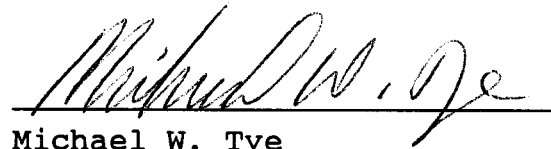
I. Pending Motions

AT&T is not aware of any pending motions.

J. Other Requirements

AT&T is not aware of any requirements set forth in the order on prehearing procedure with which it is unable to comply.

Respectfully submitted,



Michael W. Tye
AT&T
106 East College Avenue
Suite 1410
Tallahassee, Florida 32301
(904) 425-6360

Attorney for AT&T Communications
of the Southern States, Inc.

AT&T'S POSITIONS ON ISSUES

- Issue 1:** What factors should be considered when determining whether a community of interest exists in Gilchrist County?
- Position:** AT&T submits that the Commission should adhere to the community of interest factors set forth in Rule 25-4.060, Florida Administrative Code.
- Issue 2:** Is there a sufficient community of interest on the toll routes in Gilchrist County to justify implementing either EAS as currently defined in the Commission rules, or some alternative toll proposal?
- Position:** No.
- Issue 3:** Should any proposed EAS plan or toll alternative plan serve only the Gilchrist County pockets of the involved exchanges, or the entire exchanges?
- Position:** AT&T has no position on this issue at this time.
- Issue 4:** What EAS plan or toll alternative plan, if any, should be implemented on the Gilchrist County routes? Should the same plan be implemented in both directions; be optional or nonoptional; be one-way or two-way?
- Position:** AT&T submits that no EAS plan or toll alternative plan should be implemented on the Gilchrist County routes.
- Issue 5:** What are the specific cost items that should be considered in determining the proper costs of the implementation of EAS? Should the plan the Commission implements permit full recovery of costs and lost revenues, including incremental costs?
- Position:** AT&T has no position on this issue at this time.
- Issue 6:** What are the appropriate rates and charges for the plan to be implemented on this route?
- Position:** AT&T has no position on this issue at this time.

Issue 7: Should the customers be surveyed and if so, how should the survey be conducted? If surveyed customers fail to accept the plan presented to them, what alternative, if any, should be considered?

Position: AT&T has no position on this issue at this time.

Issue 8: If the Commission orders EAS or a toll alternative whereby ALLTEL and Southern Bell do not equally recover cost and lost revenues, should some form of compensation agreement be established between the two companies?

Position: AT&T has no position on this issue at this time.

Issue 9: Can the Commission legally waive its own rules pertaining to EAS? (LEGAL ISSUE)

Position: AT&T has no position on this issue at this time.

Issue 10: If the answer to Issue 9 is "yes," then which rules, if any, should be waived and in what manner and to what extent?

Position: AT&T has no position on this issue at this time.

CERTIFICATE OF SERVICE

Docket No. 870790-TL

I HEREBY CERTIFY that a true copy of the foregoing has been sent by U.S. Mail or hand-delivered to the following parties of record on this 3rd day of June, 1991.

ALLTEL, Inc.
Attn: Richard Brashear
Post Office Box 550
Live Oak, FL 32060

Southern Bell Telephone and
Telegraph Company
Harris R. Anthony, Esq.
E. Barlow Keener, Esq.
c/o: Marshall Criser
150 South Monroe, #400
Tallahassee, FL 32301

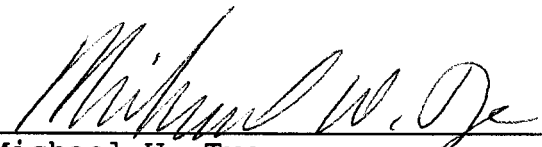
Board of County Commissioners
Gilchrist County
Attn: Mitzi Cockrell Austin
Post Office Box 37
Trenton, FL 32693

David B. Erwin, Esq.
Mason, Erwin & Horton
1311-A Paul Russell Road
Suite 101
Tallahassee, Florida 32301

Tracy Hatch, Esq.
Florida Public Service Comm.
101 East Gaines Street
Tallahassee, FL 32301

Walter D'Haeseleer
Department of Communications
Florida Public Service Comm.
101 East Gaines Street
Tallahassee, FL 32301

Theodore M. Burt, Esq.
P. O. Box 308
Trenton, FL 32693


Michael W. Tye