



Southern Bell

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May 28, 1993

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Updated Minimum Filing Requirements Waiver Requests
(Docket 920260-TL)

Dear Mr. Tribble:

Attached are updated requests for Waiver and Modification of certain schedules in the Florida Minimum Filing Requirements that Southern Bell plans to file July 2, 1993. This set of Waiver Requests completely supersedes the previous Waiver Request filed April 22, 1993. Please forward your concurrence to me as soon as possible.

I can be reached at 224-7798 if you wish to discuss further.

Sincerely,

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

Anthony M. Lombardo

Attachments
cc: All parties of record

WAS _____
OTH _____

DOCUMENT NUMBER-DATE

05842 MAY 28 83

1100-RECORDS/REPORTING

BellSouth Telecommunications, Inc.
d/b/a Southern Bell
Request for Waiver and Modification
of Minimum Filing Requirements
Docket 920260-TL

(Updated 5/28/93)

As noted in Southern Bell's March 26, 1993 "test year letter," Southern Bell plans to file MFRs utilizing forecast year 1993. In compliance with Rule 25-4.141(2)(a), Florida Administrative Code, and consistent with individual Schedule requirements, Southern Bell will also file MFRs utilizing the 1992 actual results. In addition, pursuant to Rule 25-4.141(4), Southern Bell requests modification or waiver of MFR requirements as follows:

(A)
InterLATA, IntraLATA, and Local Detail

Southern Bell's budget process forecasts total intrastate operations, but does not provide a breakdown of interLATA and intraLATA expense and investment. Furthermore, the budget process does not forecast allocation factors for interLATA or interLATA calculations. In the absence of the pooling arrangements that previously existed, intrastate interLATA and intrastate intraLATA cost allocations are of limited use, since they do not form the basis for rate setting for intrastate access charges and other intrastate tariffs. Also, in view of the minimal impact of intraLATA private line pooling, and in anticipation of the ending of the intraLATA private line pool, Southern Bell does not forecast interLATA or intraLATA allocation factors or the underlying usage data, nor does it incorporate any interLATA/intraLATA forecasting algorithms in its budget models. To develop the data now would require a substantial work effort involving extensive programming changes to the budget models and many hours would also need to be devoted to the development of relevant factor inputs. Southern Bell therefore requests that the Commission waive the requirement to populate interLATA, intraLATA, and local detail on the following MFR schedules:

A-6b	Analysis of individual rate case adjustments
B-1a	Summary rate base information - per books
B-1b	Summary rate base information - adjusted
B-3b	Florida separated average balance sheet
C-1a	Per books operating income summary
C-1b	Adjusted operating income summary
C-3	Separated income statement
C-24a	Annual minutes of use
C-24b	Monthly minutes of use
C-24c	Schedule of separation percents
C-24f	Calculation of unadjusted intrastate independent company settlements

(B)

Schedule B-5a - Monthly Operating Reports
Schedule C-24h - Monthly Cost Studies
Schedule C-24i - Traffic and Revenue Settlements Agreement
Schedule E-1a - Present and Proposed Rates and
Revenue Increases
Schedule F-2 - Demand and Facility Charts

Southern Bell requests that it not be required to file the twenty (20) copies of these reports as set forth in Rule 25-4.141(1)(i). The monthly operating reports consist of approximately 1134 pages of information, the monthly cost studies consist of 96 sheets of microfiche, the settlements agreements consist of approximately 1024 pages of information, the rates and revenue increases consist of approximately 1100 pages, and the Demand & Facility (D&F) charts consist of approximately 1250 pages. Southern Bell proposes to limit the number of copies served for each of these schedules to four (4) copies.

(C)

Schedule B-6a - Working Capital
Materials and Supplies

The detail requested in the Schedule B-6a format is not available in Southern Bell's accounting system on a forecasted or historical basis. Therefore, for historical data Southern Bell proposes to provide material data in the format shown in Attachment 1, as it did in the November 1991 MMFRs in Docket 911109-TL and in the test year 1991 Minimum Filing Requirements previously filed in Docket 920260-TL. For forecasted data, Southern Bell proposes to provide the forecasted balance of Account 1220 by month.

(D)

Schedule B-7b - Abandoned Projects

Southern Bell proposes to provide total forecasted abandoned projects. The forecast of this amount will be trended based on historical information. The identity of the specific projects that could subsequently be abandoned is not known in advance.

(E)

Schedule C-7 - Charitable Contributions and
Social Service Club Dues and Expenses

Charitable contributions are forecasted only in the aggregate, based on trended data, and are therefore available only in total on a budget basis. Under its current regulatory plan, Southern Bell excludes all

of these expenses from regulatory treatment. Therefore, this schedule is not applicable and Southern Bell proposes to exclude it from both the historical and forecasted schedules.

(F)

Schedule C-11b - Company and Contract Personnel
by Department
Schedule C-11c - Summary of Employee Compensation
Schedule C-11d - Loaded Hourly Labor Rate

Southern Bell contracts on an individual job basis rather than on an employee basis. Thus, the contract personnel information sought by this schedule is not available, and Southern Bell requests a waiver of the requirement to provide the contract personnel data in the format requested in this schedule. However, Southern Bell proposes to provide three (3) sample contractor bills, including Company labor comparisons where appropriate, and will make other contractor billing information available for the FPSC Staff's review.

In addition, Southern Bell proposes to revise job titles where the titles listed in Schedule C-11b are no longer applicable (see Attachment 2).

(G)

Schedule C-24f - Independent Company Settlements

Southern Bell requests a waiver for portions of the material to be provided in Schedule C-24f. As explained in item "A" above, Southern Bell's budget process does not forecast interLATA or intraLATA allocation factors or amounts. Southern Bell therefore does not have the information to populate page 1 of Schedule C-24f in its 1993 budget.

The pool data on page 2 of this schedule is prepared from the cost study data submitted by all pool participants. Because most of the participants exited the pool at the end of 1992, it was agreed that it would not be necessary to submit 1992 cost studies. Therefore, Southern Bell does not have the information to prepare page 2 of Schedule C-24f for 1992 or 1993.

(H)

Schedule C-28, Cost of Equal Access and
Network Reconfiguration

Southern Bell proposes to provide the data in the revised format shown in Attachment 3. The format of Schedule C-28 requires more detail than is available from the Company's Equal Access/Network Reconfiguration

tracking procedures. In Order 14452 of Docket No. 820537, the Commission utilized the benefit of depooling as a source of funds to offset Equal Access. Subsequently, in Docket No. 880069, rates were set for total revenue requirements which included Equal Access costs. Therefore, the requested information pertaining to interexchange carrier reimbursement and associated finance cost is not applicable to Southern Bell.

(I)

Schedule E-8 - Zone/mileage Charges

Because Florida Zone/Mileage charges applicable to local exchange service have been eliminated, this schedule is not applicable.

(J)

Schedule F-1b - Annual Quality of Service Standards

Southern Bell requests waiver of the requirement to provide items #2 (Call Completions), #4 (Adequacy of Intercept), and #6 (Repair Service Rebates-24 Hours) of Schedule F-1b. The programming required to modify Southern Bell's mechanized systems to provide summary reports containing this information would be impractical and would be an excessive economic burden. However, Southern Bell will provide a summary of results from the 1992 and 1993 Service Evaluations addressing all of the above topics which have been conducted by the Florida Public Service Commission Staff.

(K)

Schedules G-1 through G-9

Interim rates are not applicable since no interim rates changes will be requested in the July 2 submission.

(L)

Additional Minor Changes

In addition, we propose to make the same minor changes to several forms that we have made in the 1991 and 1990 filings. These include:

- (1) Schedule A-6b - Add lines for Cash Working Capital and Uncollectibles.
- (2) Schedule A-2a - Omit line 7 "Vehicles and Other Work Equipment" (Part 31 account) and renumber lines so rows match A-2d.

- (3) Schedules B-4a and B-4b - Add account 2220 and account 2351, and renumber the rows.
- (4) Schedules C-2a and C-2b - Correct the calculation description for the headings in columns 15 and 16 of Schedule C-2a, and column 7 of Schedule C-2b.
- (5) Schedule B-3b - Insert an additional column to show both the balance sheet amounts recorded on the Southern Bell Company books and the amounts allocated to Florida.
- (6) Schedule B-3a - Use Part 32 accounts designated in Schedule B-1 of Form M.
- (7) Schedule D-9 - Use the revised format used previously that shows the allocation of total company balances to Florida.

FLORIDA PUBLIC SERVICE COMMISSION
 Company Southern Bell Telephone & Telegraph Co.
 Docket No.
 Test Year

Schedule B-6a
 Page of
 Witness Responsible

Check Whether Data Is:
 Historic [X] or Projected []
 Average [X] or Year End []

Line No.	Year	Month	ACCOUNT 1220.1200 Plant Supplies Exempt		ACCOUNT 1220.1100 Plant Supplies Non-Exempt		ACCOUNT 1220.1300 Motor Vehicle Supplies		ACCOUNT 1220.1400 Central Office, Origination Termination Eqt. - New		ACCOUNT 1220.1400 Central Office, Origination Termination Eqt. - Reuse	
			Consumed	Balance	Consumed	Balance	Consumed	Balance	Consumed	Balance	Consumed	Balance
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
1.												
2.												
3.												
4.												
5.												
6.												
7.												
8.												
9.												
10.												
11.												
12.												
13.		Total for Year										
14.		Monthly Average for Year										

Line No.	Year	Month	ACCOUNT 1220.1500 Company Communications Equipments		ACCOUNT 1220.1800 Stock Held For Reuse		ACCOUNT 1220.1900 Other Material And Supplies		TOTAL ACCOUNT 1220.1000 Material And Supplies	
			Consumed	Balance	Consumed	Balance	Consumed	Balance	Consumed	Balance
15.										
16.										
17.										
18.										
19.										
20.										
21.										
22.										
23.										
24.										
25.										
26.										
27.		Total for Year								
28.		Monthly Average for Year								

FLORIDA PUBLIC SERVICE COMMISSION

Company Southern Bell Telephone & Telegraph Co.
 Docket No.
 Test Year

Schedule C-11b
 Page 1 of 1
 Witness Responsible:

Check Whether Data Is:
 Historic [X] or Projected []
 Average [X] or Year End []

Department (1)	Company Personnel					Contract Personnel			
	Total Personnel		Salaried		Hourly		Supervisory (8)	Engineer or Foreman (9)	Craft (10)
	Company (2)	Contract (3)	Supervisory (4)	Other (5)	Regular (6)	Temporary (7)			
COMPROLLERS									
CUSTOMER SERVICES									
EXECUTIVE									
LEGAL									
MARKETING									
NETWORK									
OPERATOR SERVICES									
PERSONNEL									
PROPERTY, PROCUREMENT & SERVICES MANAGEMENT									
TOTAL									

Reporting Schedules: None

Recap Schedules: None

Cost of Equal Access and Network Reconfiguration

FLORIDA PUBLIC SERVICE COMMISSION
 Company
 Docket No.
 Test Year

Schedule C-28
 Page 1 of 1
 Witness Responsible

Check Whether Data Is:
 Historic or Projected
 Average or Year End

	Test Year			Test Year - 1			Total to Date		
	Total (1)	Interstate (2)	Intrastate (3)	Total (4)	Interstate (5)	Intrastate (6)	Total (7)	Interstate (8)	Intrastate (9)
Investment									
1 General Support									
2 Central Office Equipment									
3 Info Orig/Term Equipment									
4 Cable & Wire Facilities									
5 Other									
6 Subtotal (1 thru 5)									
7 Accumulated depreciation									
8 Associated deferred taxes									
9 Unassociated investment tax credits									
10 Subtotal (6 thru 9)									
Expense									
11 Plant Specific									
12 Plant Non-specific									
13 Depreciation									
14 Customer Services									
15 Corporate Operations									
16 Other (includes Page 31 A/C Info.)									
17 Subtotal (11 thru 16)									
18									
19 Total (17 + 18)									
20 Amortization Amount									

Supporting Schedules:

Recap Schedules: