



Michael W. Tye  
Senior Attorney

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

July 10, 1995

ORIGINAL  
FILE COPY

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

Re: Docket No. 920260-TL

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of 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.

- ACK 2
- AFA 1
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- ~~CEM~~ Newton
- CTR \_\_\_\_\_
- EPG \_\_\_\_\_
- LEA 1
- LIN 5 Attachments
- OPC \_\_\_\_\_
- ROH Kinsman
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

cc: J. P. Spooner, Jr.  
Parties of Record

Yours truly,

*Michael W. Tye*  
Michael W. Tye

*JD*

DOCUMENT NUMBER-DATE  
06488 JUL 10 95  
FPSC-RECORDS/REPORTING

In re: Comprehensive Review of )  
the Revenue Requirements and Rate ) DOCKET NO. 920260-TL  
Stabilization Plan of Southern Bell) FILED: July 10, 1995  
Telephone and Telegraph Company. )  
\_\_\_\_\_ )

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 of the Florida Public Service  
Commission (hereinafter the "Commission") hereby submits its  
Prehearing Statement in the above-referenced docket.

A. Witness

AT&T intends to sponsor the direct testimony of the  
following witness:

1. Mike Guedel: Mr. Guedel's direct testimony, which  
was filed on June 26, 1995, opposes the proposals of  
Southern Bell Telephone and Telegraph Company (hereinafter  
"Southern Bell") and the Communications Workers of America  
(hereinafter "CWA") for disposition of the revenues  
available for rate reductions in the above-referenced case.  
Mr. Guedel recommends that the available revenues be used to  
reduce cellular interconnection rates and PBX trunk rates.

AT&T has not filed rebuttal testimony in this docket,  
but reserves the right to call rebuttal witnesses and to

present evidence necessary to respond to any matters which arise for the first time at the hearings in this proceeding.

**B. Exhibits.**

AT&T's prefiled direct testimony contains the following exhibit:

Guedel Exhibit I  
Loop Comparisons

AT&T further reserves the right to present any exhibits that may be necessary to cross-examine opposing witnesses or to respond to matters which are raised for the first time at the hearings in this proceeding.

**C. Basic Position.**

AT&T's basic position in this proceeding is that Southern Bell's and CWA's proposals for disposition of the remaining \$25 million in revenues designated for 1996 rate reductions should be rejected. Southern Bell's proposal is anticompetitive, would violate the Commission's long-standing access imputation guidelines, and could also violate the recent revisions to Chapter 364, Florida Statutes. CWA's proposal merely reduces rates for services that are already reasonably priced. AT&T submits that the \$25 million designated for rate reductions should be used to reduce cellular interconnection charges and PBX trunk rates.

D. Fact Issues.

See Attachment 1 (AT&T's Positions on Issues).

E. Legal Issues.

See Attachment 1 (AT&T's Positions on Issues).

F. Policy Issues.

See Attachment 1 (AT&T's Positions on Issues).

G. Position on Issues.

See Attachment 1 (AT&T's Positions on Issues).

H. Stipulated Issues.

AT&T is not aware of any issues that 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 this 10th day of July, 1995.



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

ATTORNEY FOR AT&T  
COMMUNICATIONS OF THE  
SOUTHERN STATES, INC.

AT&T'S POSITIONS ON ISSUES

ISSUE 1: WHICH OF THE FOLLOWING PROPOSALS TO DISPOSE OF \$25 MILLION FOR SOUTHERN BELL SHOULD BE APPROVED?

a) SBT's PROPOSAL TO IMPLEMENT THE EXTENDED CALLING SERVICE (ECS) PLAN PURSUANT TO THE TARIFF FILED ON MAY 15, 1995 (T-95-304).

b) CWA's PROPOSAL TO REDUCE EACH OF THE FOLLOWING TO \$5 MILLION:

1. BASIC "LIFELINE" SENIOR CITIZENS TELEPHONE SERVICE;
2. BASIC RESIDENTIAL TELEPHONE SERVICE;
3. BASIC TELEPHONE SERVICE TO ANY ORGANIZATION THAT IS NON-PROFIT WITH 501(C) TAX EXEMPT STATUS;
4. BASIC TELEPHONE SERVICE OF ANY PUBLIC SCHOOL, COMMUNITY COLLEGE AND STATE UNIVERSITY;
5. BASIC TELEPHONE SERVICE OF ANY QUALIFIED DISABLED RATEPAYER.

c) McCAW's AND FMCA's PROPOSAL THAT A PORTION BE USED, IF NECESSARY, TO IMPLEMENT THE DECISIONS RENDERED IN DN 940235-TL.

d) ANY OTHER PLAN DEEMED APPROPRIATE BY THE COMMISSION

AT&T'S POSITION: The Commission would reject Southern Bell's proposal. The proposal represents an attempt by Southern Bell to "remonopolize" a market that this Commission has previously deemed to be competitive.

The Commission should reject CWA's proposal. This proposal includes reductions in the prices of services that are already affordably priced today. In fact, local residential service is currently priced below the cost that Southern Bell incurs in providing the service.

The Commission should consider using some of the available revenues to reduce the charges associated with cellular interconnection.

The Commission should use all remaining available revenues to foster competition as envisioned by the recent legislation. To this end, the Commission should reduce or eliminate the charges associated with Direct Inward Dialing service (DID) when purchased by a customer selecting a PBX alternative, or it should reduce the prices for PBX trunks.

**AT&T'S WITNESS:** Mike Guedel

**ISSUE 2:** IF THE SOUTHERN BELL PROPOSAL IS APPROVED, SHOULD THE COMMISSION ALLOW COMPETITION ON THE EXTENDED SERVICE CALLING ROUTES? IF SO, WHAT ADDITIONAL ACTIONS, IF ANY, SHOULD THE COMMISSION TAKE?

**AT&T'S POSITION:** If the Southern Bell Proposal is approved, the Commission should not only allow competition on all routes, it should take all necessary actions to ensure that full and fair competition is given an opportunity to develop. For example, the Commission should require that the rates charged for ECS meet the pricing guidelines, including imputation requirements, contained in the recent legislation.

**AT&T'S WITNESS:** Mike Guedel

ISSUE 3: WHEN SHOULD TARIFFS BE FILED AND WHAT SHOULD BE THE EFFECTIVE DATE?

AT&T'S POSITION: AT&T takes no position on this issue at this time.

ISSUE 4: SHOULD THIS DOCKET BE CLOSED?

AT&T'S POSITION: No. The docket should remain open to dispose of the remaining issues carried forward to 1996.



CERTIFICATE OF SERVICE

DOCKET NO. 920260-TL

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand-delivery to the following parties of record this 10<sup>th</sup> day of July, 1995:

Bob Elias, Esq.  
Division of Legal Services  
FL Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Charles J. Beck, Esq.  
Office of the Public Counsel  
c/o The Florida Legislature  
111 West Madison St., Rm. 812  
Tallahassee, FL 32399-1400

Harris R. Anthony, Esq.  
Nancy B. White, Esq.  
c/o Nancy H. Sims  
Southern Bell Telephone  
150 S. Monroe Street  
Tallahassee, FL 32301

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

Richard D. Melson, Esq.  
Hopping Boyd Green & Sams  
P. O. Box 6526  
Tallahassee, FL 32314

Chanthina B. Abney, Esq.  
Sprint Communications Co.  
3065 Cumberland Circle  
Atlanta, GA 30339

Joseph A. McGlothlin, Esq.  
Vicki Gordon Kaufman, Esq.  
McWhirter, Grandoff & Reeves  
315 S. Calhoun St., Ste. 716  
Tallahassee, FL 32301

Floyd R. Self, Esq.  
Messer, Vickers, Caparello,  
Lewis, Goldman & Metz  
P. O. Box 1876  
Tallahassee, FL 32302-1876

Douglas S. Metcalf  
Communications Consultants, Inc.  
P. O. Box 1148  
Winter Park, FL 32790-1148

Kenneth Hoffman, Esq.  
Messer, Vickers, Caparello,  
Lewis, Goldman & Metz  
P. O. Box 1876  
Tallahassee, FL 32302-1876

Joseph P. Gillan  
Gillan & Associates  
P. O. Box 541038  
Orlando, FL 32854-1038

Michael Gross, Esq.  
Assistant Attorney General  
Department of Legal Affairs  
Room 1603, The Capitol  
Tallahassee, FL 32399-1050

Monte Belote  
Florida Consumer Action Network  
4100 W. Kennedy Blvd., #128  
Tampa, FL 33609

Benjamin H. Dickens, Jr., Esq.  
Blooston, Mordkofsky,  
Jackson & Dickens  
2120 L Street, N.W.  
Washington, D C 20037

Cecil O. Simpson, Jr.  
Peter Q. Nyce, Jr.  
Department of the Army  
901 North Stuart Street  
Arlington, VA 22203-1837

Dan B. Henrickson  
P. O. Box 1201  
Tallahassee, FL 32302

Angela B. Green, Esq.  
FL Public Telecommunications  
125 S. Gadsden St., Ste. 200  
Tallahassee, FL 32301


Donald L. Bell, Esq.  
104 East Third Avenue  
Tallahassee, FL 32303

C. Everett Boyd, Jr., Esq.  
Ervin, Varn, Jacobs, Odom  
P. O. Drawer 1170  
Tallahassee, FL 32302

Laura L. Wilson, Esq.  
FL Cable Television Assoc.  
P. O. Box 10383  
Tallahassee, FL 32302

Mark Richard, Esq.  
304 Palermo Avenue  
Coral Gables, FL 33134

David M. Wells, Esq.  
Robert J. Winicki,, Esq.  
William. S. Graessle, Esq.  
Mahoney, Adams & Criser  
P. O. Box 4099  
Jacksonville, FL 32201

  
Michael W. Tye