

FLORIDA PUBLIC SERVICE COMMISSION
Capital Circle Office Center • 2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

MEMORANDUM

August 17, 1995

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYO)

FROM: DIVISION OF COMMUNICATIONS [STRONG, HOWELL] ^{jsl} ^{HA} ^{RAT}
DIVISION OF LEGAL SERVICES [ELIAS] ^{RVE} ^R

RE: DOCKET NO. 950814-TL - REQUEST FOR APPROVAL OF
TARIFF FILING PROPOSING CELLULAR SERVICE FOR
DOG ISLAND BY ST. JOSEPH TELEPHONE AND
TELEGRAPH COMPANY (T-95-404 FILED 6-26-95)

AGENDA: AUGUST 29, 1995 - REGULAR AGENDA - TARIFF FILING -
INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: 60 DAY SUSPENSION DATE WAIVED

SPECIAL INSTRUCTIONS: I:\PSC\CMU\WP\950814.RCM

CASE BACKGROUND

More than fifty residents of Dog Island have requested that St. Joseph Telephone & Telegraph Company ("St. Joseph" or "the Company") provide telephone service. The residents of Dog Island are in the Carrabelle exchange which is in the service territory of St. Joseph. Providing service to Dog Island requires no exchange boundary change or extension. However, the task of providing telephone service to Dog Island residents presents the Company with unusual conditions.

Dog Island is located approximately four miles from the mainland of Florida. Access to Dog Island is limited. There is no bridge or highway connecting Dog Island to the mainland. Ferry service to and from Dog Island is limited. A small airstrip is located on the island. The Company's service personnel would be dependent on the limited ferry service to reach the island.

There are approximately 125 residences on the island and, of these, the Company estimates approximately 50 residences will initially subscribe to telephone service. The overwhelming majority of people with residences at Dog Island consider the residences their second or vacation homes.

Due to its location off the coast of Florida, Dog Island is vulnerable to storms in the Gulf of Mexico. Residents of Dog Island enjoy the natural beauty of the island. While many of these

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residents desire telephone service, some are concerned that it could harm the environment and the scenic beauty of the island. However, power poles are already located on the island as well as water facilities.

EXECUTIVE SUMMARY

* The Company filed a one year experimental tariff to provide local exchange service via cellular technology for Dog Island at monthly rates equal to those being currently paid by subscribers in the Carrabelle exchange. There would be no usage charges for the cellular service offered by the Company. St. Joseph would implement an experimental premise visit charge to Dog Island residents of \$43.00 from December 1, 1995 through September 1, 1996. The Company also plans a non-tariffed offering of programmed cellular units at only \$40.00 per unit to Dog Island residents; considerably less than the Company's cost.

* Staff recommends the Company's filing be approved. Additionally, staff recommends the Company perform a feasibility study for providing telephone service to the island using submarine cable. This feasibility study, along with information on the number of Dog Island residents requesting and receiving telephone service, should be submitted to the staff by January 1, 1996.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission approve the tariff filing proposing local exchange service via cellular technology for Dog Island by St. Joseph Telephone & Telegraph Company?

RECOMMENDATION: Yes, the Commission should approve the experimental tariff filing proposing local exchange service via cellular technology for Dog Island by St. Joseph Telephone & Telegraph Company. The Company should also perform a feasibility study with cost data for providing service to Dog Island using buried submarine cable and submit a copy of the study (as described below) to the Commission staff by January 1, 1996. The Company should also indicate in that report what efforts have been made to provide telephone service, how many residences are requesting service and how many residences have had service established. The Commission should allow the Company to file quarterly service reports which separate Dog Island service results from the rest of the Carrabelle exchange.

STAFF ANALYSIS: On June 26, 1995 St. Joseph filed a tariff which, if approved, provides local exchange telephone service to residents of Dog Island by using cellular technology. Staff recommends the tariff be approved as filed.

Provisioning of service:

The Company intends to provide service through the use of cellular technology. The cellular instrument the Company will use to provide service will be a standard unit equipped with an AC/DC converter. Roaming restrictions will be programmed into the units to allow customers to have the same local calling scope as current subscribers of the Carrabelle exchange. The units could be purchased through the telephone company at a cost of \$40.00, or elsewhere at market prices; if purchased elsewhere, the Company would have to program the roaming restrictions. The Company is offering the cellular units at below their cost to price them at a rate closer to what customers would normally pay for CPE units.

Dog Island customers will be provided a Carrabelle (697) telephone number and Carrabelle's calling scope:

Alligator Point	\$.25	extended calling plan
Apalachicola	\$.25	extended calling plan
Eastpoint	\$.25	extended calling plan
St. George Island	\$.25	extended calling plan
Tallahassee		Toll free EAS
Sopchoppy		Toll free EAS
Crawfordville		Toll free EAS

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Dog Island customers will be billed appropriate toll charges by the Company in the same manner as other local exchange customers.

Should customers require data/fax capabilities over 14.4 kb/s, there are cellular units available to convert the standard connection to meet this requirement. Equipment could be purchased at cost from St. Joseph, or from other vendors at market prices.

The Company will provide telephone service using cellular technology by installing a Yagi antenna and wiring at individual customer's locations in as safe a method as possible, preferably inside the attic of the subscribers' residences. For each antenna that must be installed outside, the antenna will be weather-resistant with extra height for proper transmission from the cellular tower located in Carrabelle.

Attributes of the Proposed Cellular System:

A. Cost to Build

It is the Company's belief that serving Dog Island through cellular technology is the most acceptable method of providing service because of the higher capital cost for alternative means of providing service (submarine cable, radio or microwave). The Company estimates its capital cost to provide cellular service to Dog Island will be less than \$20,000. The Company believes the sunk investment for each of the other alternatives (submarine cable, radio and microwave) would exceed \$250,000.

B. Reliability of Service

An important benefit from utilization of cellular technology is that the probability of losing service on the whole island is remote. The Company would have to have complete loss of AC power on the island for an extended period of time, or loss of land-based telecommunications plant supporting the island. (Since the emergency facility on the island will have backup generators, service for that facility could be maintained for short periods of time in spite of total AC power failure.)

Basic Exchange Telephone Radio Service (BETRS) was ruled out by the Company not only because of its higher capital cost, but its inability to provide quality, reliable service. The Company discovered that BETRS lacked sufficient radio channels from the Federal Communications Commission to provide an acceptable level of service to Dog Island residents.

C. Environmental Concerns

Many residents live on Dog Island because of its natural beauty. The Company believes the residents, while desiring telephone service, also desire the natural beauty of the island to be preserved. Of the alternatives explored by the Company for providing telephone service, St. Joseph believes the use of cellular technology, which requires no poles or underground cables, best satisfies the environmental concerns of some Dog Island residents.

Rates:

The Company is seeking to recover some of its cost for initiating service by applying a premise visit charge of \$43.00 for service requested on or after December 1, 1995. Dog Island residents requesting service before December 1, 1995 would be assessed the \$4.25 premise visit charge currently paid by St. Joseph customers requesting service.

The \$43.00 charge, effective December 1, 1995, would cover the \$18.00 cost of the ferry trip to the island, plus an additional hour of travel time for the installer at the loaded labor rate of \$25.00 an hour. This premise visit charge would be an experimental, transitional rate. If approved, the \$43.00 premise visit charge would not be assessed to Dog Island residents the first 3 months the tariff was in effect because the Company could, if it had a backlog of service connection orders, process several of them at a time thus spreading the transportation costs of sending a telephone serviceman to and from the island over several service connections.

The Company seeks approval of the \$43.00 premise visit charge for Dog Island customers as an experimental, transitional rate, pursuant to the provisions of Section 364.057, Florida Statutes. The \$43.00 rate would last from December 1, 1995 until September 1, 1996. St. Joseph has informed staff that after this charge has been in effect the Company may review whether or not service connection charges, including the premise visit charge to Dog Island, adequately cover its cost of service. The Company may request to adjust its premise visit charge for service connections to Dog Island if it believes such an adjustment is needed to achieve a closer relationship between the costs and charges for Dog Island residents.

To establish service with the Company, residence customers of Dog Island would, effective December 1, 1995, pay a primary service order charge of \$11.00, an access line connection charge of \$15.00 and the Dog Island Premise visit surcharge of \$43.00 for a total of

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\$69.00. The service ordering charges for the Company's customers are provided on page 2 of schedule 1.

Staff recognizes most Florida LECs are allowed to charge service connections rates which approximate their costs. Staff is also aware that the Commission has previously allowed the Company to impose a service connection charge surcharge within an exchange to recoup unique expenses. When there was a toll for all vehicles entering St. George Island, the Commission allowed the Company to charge a \$4.00 surcharge for service connections for new installations and a \$2.00 surcharge per move or change order for residences on St. George Island. The surcharges were approved in Order No. 14941 in Docket No. 83490 in September, 1986 and remained in effect until September, 1992 when the toll charges to cross the St. George Island bridge were eliminated. Staff believes the service connection surcharge for Dog Island should be approved.

Dog Island is part of the Carrabelle exchange. The experimental filing would also allow Dog Island residents to be charged the same amount for monthly local telephone service as Carrabelle subscribers currently receiving service from September 1, 1995 to September 1, 1996; no cellular service charges would be applied. The residential monthly access line rate for Carrabelle is \$9.15; business is \$24.00.

Service Reports:

The Company believes that sometimes bad weather, rough seas, sporadic ferry schedules and the presence of most island property owners only on weekends and holidays, will prevent St. Joseph from meeting the time requirements for installations and repair. Failures and the reason for such failures will be noted on the quarterly service reports to the Commission. The Company requests that such reports list the customers of Dog Island separately because of the difficulty of serving such subscribers. The staff recognizes the unique characteristics of Dog Island and does not object to the Dog Island reports being shown separately, rather than with other Carrabelle quarterly service reports filed with the Commission.

Additional Information To Be Provided Staff:

While recommending approval of this tariff as filed, staff also believes the Company should further explore the possibility of providing service through submarine cable. The Commission staff received limited information from the Company regarding the provisioning of service to Dog Island by means of submarine cable. The Commission staff has received letters from many Dog Island

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residents indicating their preference to be provided traditional telephone service. Staff would also note that the capital cost to provide cellular service to Dog Island is rather modest (less than \$20,000) and should not preclude use of another provisioning method in the future.

Staff recommends the Company perform a feasibility study with cost data for providing service to Dog Island using submarine cable or other appropriate means and submit a copy of the study to the Commission staff by January 1, 1996. Such a study should include designs from at least 2 contractors with the probable routes for laying of cable. The feasibility study should address environmental concerns and potential problems. It should also indicate the permits and rights-of-way needed to provide telephone service and address estimates of problems with maintenance of submarine cable. The feasibility study should include a financial analysis which compares the submarine cable scenario to the cellular scenario.

If telephone service was provided to Dog Island residents by traditional means rather than cellular, it would alleviate concerns regarding privacy of phone conversations while providing a higher quality of phone service. In addition, subscribers would be better situated to receive enhanced telephone services as they became available.

Staff is aware that some residents of Dog Island have been eagerly awaiting the availability of telephone service from the Company for more than two years. We are concerned that service be provided to the residents of Dog Island in an expeditious manner. In the report on submarine cable, the company should indicate what efforts have been made to provide telephone service, how many residences are requesting service, and how many residences have had service established.

Conclusion:

While anticipating that the Company's earnings will be negatively affected as a result of this filing, staff believes that approval of the filing will still allow the Company to earn within its allowed rate of return range in 1995 based on St. Joseph's reported earnings for the first six months of 1995. Staff believes approval of this filing would lower the Company's ROE by not more than .1%. Staff also believes the provisioning of the service through cellular technology and the special service connection charge proposed by the Company are warranted due to the unusual circumstances of Dog Island and its residents. Staff recommends the Company's tariff be approved as filed.

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ISSUE 2: Should this docket be closed?

RECOMMENDATION: Yes. If the Commission approves Issue 1, this tariff should become effective September 1, 1995. If a protest is filed within 21 days from the issuance date of the Order, the tariff should remain in effect with any revenues held subject to refund pending the resolution of the protest.

STAFF ANALYSIS: If the Commission approves Issue 1, this tariff should become effective September 1, 1995. If a protest is filed within 21 days from the issuance date of the Order, the tariff should remain in effect with any revenues held subject to refund pending the resolution of the protest.

GENERAL EXCHANGE TARIFF

ST. JOSEPH TELEPHONE
& TELEGRAPH COMPANY
FLORIDA
ISSUED BY: JOHN H. VAUGHAN
VICE PRESIDENT

Twelfth SECTION 3
~~ELEVENTH~~ REVISED SHEET 5
CANCELS ~~TENTH~~ REVISED SHEET 5
Eleventh
EFFECTIVE: ~~DECEMBER 1, 1993~~
September 5

BASIC LOCAL EXCHANGE SERVICE

6. MONTHLY EXCHANGE RATES

1. Monthly exchange rates are applicable in each exchange for classes of basic local service offered.
2. Residence and Business Basic Exchange

	<u>Business 1-Pty</u>	<u>Residence 1-Pty</u>
Alligator Point	24.00	9.15
Altha	18.25	7.30
Apalachicola	17.25	6.30
Blountstown	17.25	6.30
Bristol	24.00	9.15
Carrabelle <i>(Excludes Arg Island*)</i>	24.00	9.15
Chattahoochee	20.45	7.80
Eastpoint	17.25	6.30
Hosford	24.00	9.15
Port St. Joe	17.25	6.30
The Beaches	17.25	6.30
Tyndall	18.55	6.85
Wewahitchka	17.25	6.30

H. ARRANGEMENTS FOR ROTARY SERVICE

General

All lines in a group of two way flat rate or business auxiliary (inward) main station lines arranged for rotary, hunting or similar service which allows completion of an incoming call to any of the lines in the group from a line that is called but is in use, to another line, by means of central office equipment, will have a rate on each of the lines in the group.

** Experimental offering 9-1-95 to 9-1-96)*

GENERAL EXCHANGE TARIFF

**ST. JOSEPH TELEPHONE
& TELEGRAPH COMPANY
FLORIDA**

SIXTH SECTION 6
~~FIFTH~~ REVISED SHEET 2
CANCELS ~~FOURTH~~ REVISED SHEET 2
FIFTH

SERVICE CONNECTION CHARGES

6.1 DEFINITIONS - Continued

6.1.4 Restoration Charge - A charge applying to restoration of service following a temporary suspension of such service, either at the request of the subscriber or for nonpayment of service. When service has been disconnected for non-payment, the contract is considered to have been terminated. Re-establishment of service may be made only upon the execution of a new contract. The reconnect charge will apply in lieu of regular connection charges and new or additional deposits may be required.

6.2 SCHEDULE OF CHARGES

6.2.1	Service Ordering Charge, each order	<u>Residence</u>	<u>Business</u>
a.	Primary Service Order - Associated with the connection of new or additional access lines.	\$11.00	\$27.00
b.	Secondary Service Order - Associated with the inside move or change of existing service. (one charge per simultaneously placed order)	\$ 5.00	\$19.00
6.2.2	Access Line Connection Charge, each access line, off premise station line, or tie line.	\$15.00	\$15.00
6.2.3	Premises Visit Charge, one charge applies per customer request.	\$ 4.25	\$ 4.25
6.2.4	<u>*Dog Island only - Premise Visit Charge</u>	<u>\$43.00</u>	<u>\$43.00</u>

*Experimental offering 12-1-95 to 9-1-96
ISSUED:

EFFECTIVE:

JAN 1 '87

B. R. GIBSON, JR.
EXECUTIVE VICE PRESIDENT
FORT ST. JOE, FLORIDA

Susan F. Clark
Chairman

State of Florida



Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(904) 413-6040
FAX (904) 487-1716

Public Service Commission

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AUG 14 1995

MEMORANDUM

August 10, 1995

EPSC RECORDS/REPORTING

TO: BLANCA BAYO, DIRECTOR, DIVISION OF RECORDS AND REPORTING
FROM: KAY POSEY, CHAIRMAN CLARK'S OFFICE
RE: DOCKET NO. 950814

Please place the attached letter in the correspondence side of the above-noted docket. Thank you.

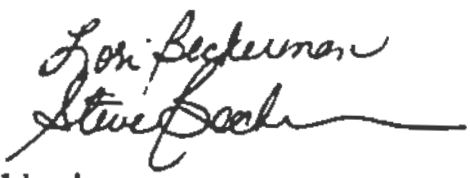
Attachment

August 7, 1995

Susan F. Clark, Chairman
Public Service Commission
Fletcher Building
101 E. Gains St.
Tallahassee, FL

To: Susan F. Clark, J Terry Deason, Julia L. Johnson,
Diane K. Kiesling and Joe Garcia

From: Steve and Lori Beckerman
Property Owners
Dog Island, Florida



Re: Telephone Service for Dog Island

We are writing to urge you to approve the recommended proposal by the Telephone Company to furnish immediate cellular phone service to Dog Island, as a temporary solution to address an immediate need, while the Telephone Company works out regular service to Dog Island. It is our understanding that this matter is scheduled for your August 15, 1995 meeting.

It is important that Island residents are afforded reasonable access to telephone service. Your vote of approval is important.

Thank you in advance for your consideration.

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AUG 07 1995
Florida Public Service Comm.
Commissioner Clark

Susan F. Clark
Chairman

State of Florida



Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(904) 413-6040
FAX (904) 487-1716

Public Service Commission

August 10, 1995

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AUG 11 1995

Mr. Tim Ashton
Neel Mechanical Contractors, Inc.
P.O. Box 1916
Thomasville, Georgia 31799-1916

EPSC-RECORDS/REPORTING

Dear Mr. Ashton:

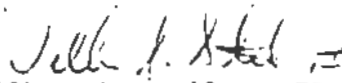
Thank you for your letter regarding your concern about the provision of telephone service to Dog Island.

The Chairman is unable to correspond with you directly because the matter addressed in your letter is pending in Docket No. 950814-TL. Section 350.042, Florida Statutes, prohibits Commissioners from receiving or initiating communications off the record involving open dockets.

The schedule for this case calls for the Commission's staff to file its recommendation on August 17, 1995. The Commission will consider the staff's recommendation its August 29, 1995, regular agenda conference. I assure you that the Commission will give this matter all due consideration at that time. The Commission's Agenda Conference is open to the public and will begin at 9:30 a.m.

Thank you again for your letter.

Sincerely,


Wilbur J. Stiles, II
Assistant to the Chairman

c: Division of Records and Reporting
(Docket No. 950814-TL)



**NEEL
MECHANICAL
CONTRACTORS, INC.**

PUBLIC SERVICE Commission
FLETCHER BLDG.
101 E. GAMES ST
VIA FAX 904-487-1716

ATTN: SUSAN F. CLARK, CHAIRMAN
J. TERRY DEASON
JULIA L. JOHNSON
DIANE K. KIESLING
JOE GARCIA.

RECEIVED

AUG 08 1995

Florida Public Service Comm.
Commissioner Clark

Gentlemen,

IT IS MY UNDERSTANDING THAT THE HEARING
TO APPROVE TELEPHONE SERVICE TO DOG ISLAND, FL.
IS TO BE HELD ON AUGUST 15. AS OWNER
OF DOG ISLAND LOT # 54, BLOCK 14, UNIT # 1
I WISH TO EXPRESS MY DESIRE THAT THIS
APPROVAL BE GRANTED. PHONE SERVICE WOULD
ADD GREATLY TO THE RESIDENTS OF THE
ISLAND AND PROVIDE THE COMMUNICATIONS
NEEDED FOR INCREASED SAFETY AS WELL.

I WOULD APPRECIATE YOUR SUPPORT IN
THIS REGARD

Sincerely

TIM ASTON



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE: August 8, 1995
TO: CHAIRMAN CLARK
FROM: ALAN TAYLOR, DIVISION OF COMMUNICATIONS *AT*
RE: INDEX #95-217, DRAFT RESPONSE TO KENT & BETTY MILLER

Attached is a draft response to the Millers. Please let me know if you have any questions.

Attachment

c:\Division of Records & Reporting, DN 950814-TP
Alan Taylor
B. Bailey, #167

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SUSAN F. CLARK
CHAIRMAN



CAPITAL CIRCLE OFFICE CENTER
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(904) 413-6040

Public Service Commission

August 8, 1995

Kent & Betty Miller
2004 West Randolph Circle
Tallahassee, Florida 32312

Dear Mr. & Mrs. Miller:

Thank you for your recent letter concerning Docket Number 950814, a request by St Joseph Telephone Company for approval of its tariff filing proposing cellular service for Dog Island. Staff is currently scheduled to file a recommendation for the Commission to consider at its August 29, 1995, Agenda Conference.

To ensure that all Commissioners are aware of your interest, a copy of your letter will be placed in the correspondence side of the file for consideration at that time. Meanwhile, if you have any questions, please feel free to contact Alan Taylor at (904) 413-7518.

Again, thank you for your interest.

Sincerely,

Susan F. Clark
Chairman

c: Alan Taylor
DN 950814

FLORIDA PUBLIC SERVICE COMMISSION

Wilbur J. Stiles, II

ASSISTANT TO CHAIRMAN CLARK

DATE: 08/03/95

**TO: Division of
Communications**

RE: Index #95- 217

**Please prepare a response for the
Chairman's signature within one week.
Thank you.**

DATE REC'D 4.55 RESPOND BY

ASSIGNED TO: (1) Howell
(2) Strong

RETURN COMPLETE FILE TO: B. BAILEY

FACSIMILE COVER PAGE

To: Susan F. Clark	From:
Time: 11:04:51	Date: 8/1/95
Pages (including cover): 1	

Dear Ms. Clark:

At your August 15 meeting you will be considering a proposal for phone service for Dog Island. This is a request for approval of this much needed and long awaited service.

Thank you.

Kent Betty Miller
2004 W Randolph Circle
Tallahassee 32312
385-4405

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AUG 01 1995
Florida Public Service Comm.
Commissioner Clark



State of Florida

Susan F. Clark
Chairman



Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(904) 413-6040
FAX (904) 487-1716

Public Service Commission

August 8, 1995

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AUG 8 1995

Mr. Gary A. Stilwell, Chairman
Dog Island Conservation District
3111-21 Mahan Drive
Box 124
Tallahassee, Florida 32308

FPSC-RECORDS/REPORTING

Dear Mr. Stilwell:

Thank you for your letter of August 5, 1995, regarding your organization's concern about the provision of telephone service to Dog Island.

The Chairman is unable to correspond with you directly because the matter addressed in your letter is pending in Docket No. 950814-TL. Section 350.042, Florida Statutes, prohibits Commissioners from receiving or initiating communications off the record involving open dockets.

The schedule for this case calls for the Commission's staff to file its recommendation on August 17, 1995. The Commission will consider the staff's recommendation its August 29, 1995, regular agenda conference. I assure you that the Commission will give this matter all due consideration at that time. The Commission's Agenda Conference is open to the public and will begin at 9:30 a.m.

Thank you again for your letter.

Sincerely,

A handwritten signature in black ink that reads "Wilbur J. Stiles, II".

Wilbur J. Stiles, II
Assistant to the Chairman

c: Division of Records and Reporting
(Docket No. 950814-TL)

DOG ISLAND CONSERVATION DISTRICT

3111-21 Mahan Drive, Box 124
Tallahassee, FL 32308

750814-76

RECEIVED

AUG 07 1995

From Public Service Comm.
Commissioner Clark

August 5, 1995

Ms. Susan F. Clark, Chairman
Public Service Commission
Fletcher Building
101 E. Gaines St.
Tallahassee, FL 32301

Dear Ms. Clark:

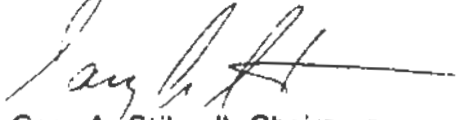
I understand that the PSC will meet on August 15, 1995 and that one of the topics for discussion will be providing telephone service for the residents and property owners on Dog Island.

I have written before in favor of this action (see attached letter of 12/20/94) and once again write to encourage you to approve the proposed recommendation to furnish telephone service to Dog Island immediately.

I further understand that this is an interim solution. We expected a non-cellular service (via microwave or underground cable) from our original talks with St. Joe Telephone. We still expect that in the future but will settle for this cellular solution to meet our immediate need.

Thank you for your attention to this matter.

Sincerely,



Gary A. Stilwell, Chairman
DICD Board of Directors

DOG ISLAND CONSERVATION DISTRICT

3111-21 Mahan Drive, Box 124
Tallahassee, FL 32308

December 20, 1994

Mr. Jack Shreve, Public Counsel
Office of the Public Counsel
111 W. Madison Street
812 Claude Pepper Building
Tallahassee, FL 32399-1400

Dear Mr. Shreve:

I am writing in regard to the "Petition of St. Joseph Tel & Tel Company for Declaratory Statement concerning potential service to Dog Island" dated December 13, 1994.

As Chairman of the Dog Island Conservation District, I am speaking for the Board of Directors in favor of providing said service.

The Dog Island Conservation District was created as a Florida political subdivision by FS 75-374 in 1975 and is charged with the preservation of Dog Island in such a way as is compatible with human habitation.

The island is about 7 miles long and less than 1 mile wide. It is currently the permanent home of 14 residents, 120 houses, a motel and a volunteer fire department fire hall. There are existing plats for an additional 100 houses. The total voting population numbers around 500. Sixty of the existing home owners have signed a petition requesting phones and have agreed to pay an \$11.00 monthly minimum. Their request has been approved by the DICD Board, provided it can be installed in an environmentally and aesthetically pleasing manner (e.g., wireless or buried cable - not overhead wire). The ideal solution originally discussed with Mr. John Vaughn of the St. Joe Telephone Co. would be the OptiPhone Plus wireless point-to-point telephone system.

Our fire department and emergency medical team require this for reliable communication. They and the other petitioners now pay outrageous amounts for local telephone service via commercial cellular companies and feel that we should have the same public services offered to other Florida citizens.

Thank you for your attention to this matter.

Sincerely,

Gary A. Stilwell, Chairman
DICD Board of Directors