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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Comprehensive Review of the)
Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone & Telegraph Company)

Docket No. 920260-TL

Filed: August 17, 1995

POST-HEARING STATEMENT OF ISSUES AND POSITIONS OF
FLORIDA MOBILE COMMUNICATIONS ASSOCIATION, INC.'S

Florida Mobile Communications Association, Inc. ("FMCA"), by and through its undersigned counsel and pursuant to Commission Rule 25-22.056(3), Florida Administrative Code, hereby submits its Post-Hearing Statement of Issues and Positions in the above-captioned docket.

I. BASIC POSITION

• FMCA's Basic Position: FMCA is opposed to Southern Bell's ECS proposal; the patently anticompetitive plan flies in the face of all legislative and commission directives to foster competition. \$4,063,269 of the Bell rate reductions should be used to flow-through the October 1995 and October 1996 access charge reduction to mobile carrier interconnection usage rates.

Issue 1: Which of the following proposals to dispose of \$25 million for Southern Bell should be approved?

- ACK ✓ (1) SBT's proposal to implement the Extended Calling
- AFA 2 Service plan pursuant to the tariff filed on May 15, 1995. (T-95-
- APP _____
- CAF 304.)
- CMD Norton (2) CWA's proposal to reduce each of the following by \$5
- CTR _____ million:
- EAG _____
- LEG 1 (i) Basic "lifeline" senior citizens telephone
- LIN 5 service;
- OPC _____
- RCH Vino (ii) Basic residential telephone service;
- SEC 1 _____
- WAS _____
- OTH _____

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(iii) Basic telephone service to any organization that is non-profit with 501(c) tax exempt status;

(iv) Basic telephone service of any public school, community college and state university;

(v) Basic telephone service of any qualified disabled ratepayer.

(3) McCaw's and FMCA's proposal that a portion be used, if necessary, to implement the decisions rendered in Docket No. 940235-TL.

(4) Any other plan deemed appropriate by the Commission.

* FMCA's Position: (1) Southern Bell's ECS proposal should be denied. It is an attempt to monopolize the intra-LATA toll routes prior to 1+ intra-LATA competition.

* FMCA's Position: (2) CWA's proposal to reduce basic service rates that are presently priced below cost should be denied.

* FMCA's Position: (3) \$4,063,269 of the rate reduction should be used to flow through the October 1995 and 1996 access charge reductions to mobile interconnection usage rates.

* FMCA's Position: (4) FMCA takes no position on this issue.

Issue 2: If the Southern Bell proposal is approved, should the Commission allow competition on the Extended Calling Service Routes? If so, what additional actions, if any, should the Commission take?

* FMCA's Position: FMCA takes no position on this issue.

Issue 3: When should the tariffs be filed and what should be the effective date?

* FMCA's Position: The tariffs should be filed within 15 days of the order and effective October 1, 1995.

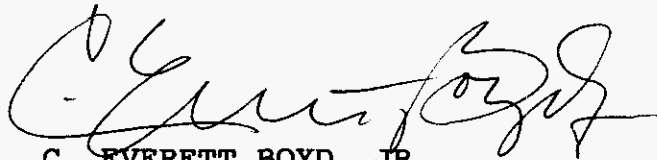
Issue 4: Should this docket be closed?

* FMCA's Position: No.

LEGAL ISSUES

* FMCA's Position: FMCA adopts the positions of McCaw on the legal issues identified by Staff.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail on this 17th day of August, 1995, to the following:

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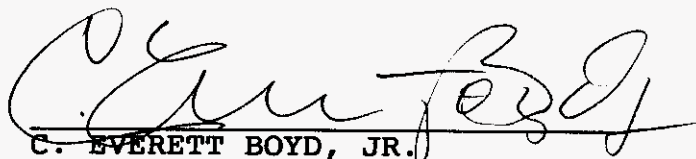
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