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ORIGINAL  
FILE COPY

February 26, 1996

Ms. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center, Rm. 110  
Tallahassee, Florida 32399-0850

Re: **Docket No. [REDACTED]**  
**Groveland Exchange EAS**

Dear Mrs. Bayó:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s Direct Testimony of Joseph A. Stanley, Jr., which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely yours.

*J. Phillip Carver*  
J. Phillip Carver

ACK   
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_ Enclosures

cc: All Parties of Record  
R. G. Beatty  
A. M. Lombardo  
R. Douglas Lackey

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**CERTIFICATE OF SERVICE  
DOCKET NO. 941281-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 26 day of February, 1996 to the following:

Donna Canzano  
Staff Counsel  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32399

Alan N. Berg  
Senior Attorney  
United Telephone Co. of Florida  
Post Office Box 5000  
Altamonte Spgs, FL 32715-5000

*J. Phillip Carver*  
J. Phillip Carver (JA)

1                   BellSouth Telecommunications, Inc.  
2                   Testimony of Joseph A. Stanley, Jr.  
3                   Before the Florida Public Service Commission  
4                   Docket No. 941281-TL  
5                   February 26, 1996  
6  
7

8 Q. Please state your name and business address.

9

10 A. I am Joseph A. Stanley, Jr. My business address is 3535  
11 Colonnade Parkway, Birmingham, Alabama 35243.

12

13 Q. By whom are you employed?

14

15 A. I am employed by BellSouth Telecommunications, Inc. as a  
16 Director in the Consumer Services Organization.

17

18 Q. Please give a brief description of your background and  
19 experience.

20

21 A. I graduated from Auburn University with a Bachelor of  
22 Science degree in Industrial Engineering and from the  
23 University of Alabama in Birmingham with a Masters in  
24 Business Administration. I have 27 years experience in  
25 the telephone industry and am currently responsible for

1       developing tariffs and pricing for local exchange and  
2       toll residential service in the nine BellSouth states.

3

4 Q.   Have you previously testified before this Commission?

5

6 A.   Yes, I testified during the hearing on BellSouth's  
7       Extended Calling Service (ECS) filing last year.

8

9 Q.   What is the purpose of your testimony?

10

11 A.   The purpose of my testimony is to address the issues  
12       identified in Docket No. 941281-TL.  These issues  
13       include whether a sufficient community of interest  
14       exists between Groveland and Orlando to justify a plan  
15       that would provide toll relief and what the revenue  
16       impact would be on BellSouth.

17

18 Q.   Which routes associated with this Docket involve  
19       BellSouth exchanges?

20

21 A.   The only route involved is Groveland to Orlando.  
22       Orlando is a BellSouth exchange.

23

24 Q.   Did BellSouth conduct traffic studies on this route?

25

1 A. No, BellSouth did not conduct traffic studies on the  
2 route from Orlando to Groveland. This is an interLATA  
3 route; Orlando is in the Orlando LATA and Groveland is  
4 in the Gainesville LATA. Data is not available to  
5 BellSouth on interLATA routes. The Commission  
6 recognized this and in Order No. PSC-95-0596-FOF-TL,  
7 dated May 11, 1995, relieved BellSouth of the  
8 requirement to file traffic data on the interLATA route  
9 in this Docket.

10

11 Q. Does BellSouth have a position as to whether sufficient  
12 community of interest exists between Orlando and  
13 Groveland to justify non-optional flat rate Extended  
14 Area Service (EAS)?

15

16 A. No. In the absence of traffic data, we do not have any  
17 evidence to know whether a sufficient community of  
18 interest exists. We are not aware of any other  
19 significant community of interest consideration that  
20 would justify flat rate EAS. The Commission in Order  
21 No. PSC 95-0875-FOF-TL did state that while United's  
22 traffic study did support the M/A/M (Messages per Access  
23 Line per Month) requirements set forth in Rule  
24 25-4-060(3), the distribution requirement of at least  
25 50% of the subscribers in the petitioning exchange

1 making 2 or more calls per month was not met.

2

3 Q. Does BellSouth think that an alternative plan, such as  
4 Extended Calling Service, should be recommended as a  
5 method to provide toll relief?

6

7 A. No. We do not. Since this is an interLATA route,  
8 BellSouth would be required to obtain waivers in order  
9 to provide service between Orlando and Groveland. The  
10 only such waivers that we have been successful in  
11 obtaining are for non-optional flat rate EAS.

12

13 If EAS is not approved, and the Commission wishes to  
14 consider an ECS alternative, then the issues would seem  
15 to be the same as for the routes considered in the  
16 Commission Staff's workshop on January 23, 1996 where a  
17 modified ECS (MECS) plan was presented. The MECS plan  
18 includes a per message rate for residence and per minute  
19 rate for business (as described in BellSouth's existing  
20 ECS tariff) and also includes a 10% additive in the  
21 access line rate of the petitioning exchange. The  
22 petitioning exchange would also be required to be  
23 balloted, with the results of the ballot determining  
24 whether a waiver be requested. The Groveland to Orlando  
25 route was not included in the routes that were discussed

1 during the workshop by the Commission Staff.

2

3 Q. If non-optional flat rate EAS or an alternative plan,  
4 such as modified ECS was Ordered, what would be the  
5 revenue effect to BellSouth?

6

7 A. Without supporting data, we are unable to determine our  
8 access revenue loss. BellSouth would incur additional  
9 cost associated with either leasing or constructing  
10 facilities between Orlando and Groveland, since today we  
11 are prohibited from transporting those calls. We can  
12 not estimate this cost since we do not know the traffic  
13 volumes.

14

15 Q. What effect will the passage of the Federal legislation  
16 have on BellSouth's ability to provide a "calling plan"  
17 between Orlando and Groveland?

18

19 A. At this time it is unknown what effect the new  
20 legislation will have. We do feel that it will be some  
21 time before BellSouth will be allowed to compete in the  
22 interLATA long distance market, and then only under the  
23 guidelines that will be set forth by the FCC.

24

25 Q. Please summarize your testimony.

1

2 A. BellSouth does not feel that non-optional flat rate EAS  
3 is warranted between Orlando and Groveland. The rule is  
4 clear on the requirements, and traffic data provided by  
5 United does not appear to meet those requirements. If  
6 the Commission still believes that some toll relief is  
7 justified, then we recommend that an alternative plan  
8 such as ECS be considered.

9

10 Q. Does this conclude your testimony?

11

12 A. Yes.

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