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March 11, 1996

Ms. Blanca S. Bayo  
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. 930173-TL Polo Park EAS

Dear Ms. Bayo:

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 (BL)*  
J. Phillip Carver

ACK

AFA

ACE  Enclosures

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

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*[Handwritten signature]*

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**CERTIFICATE OF SERVICE**  
**Docket No. 930173-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by U.S. Mail this 11<sup>th</sup> day of March, 1996 to:

J. Adams  
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2540 Shumard Oak Boulevard  
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1                           BellSouth Telecommunications, Inc.  
2                           Testimony of Joseph A. Stanley, Jr.  
3                           Before the Florida Public Service Commission  
4                           Docket No. 930173-TL  
5                           March 11, 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  
11           3535 Colonnade Parkway, Birmingham, Alabama 35243.  
12

13   Q.    By whom are you employed?

14  
15   A.    I am employed by BellSouth Telecommunications, Inc.  
16           as a Director in the Consumer Services Organization.  
17

18   Q.    Please give a brief description of your background  
19           and 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  
25           in the telephone industry and am currently

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

4  
5 Q. Have you previously testified before this Commission?

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

9  
10 Q. What is the purpose of your testimony?

11  
12 A. The purpose of my testimony is to address the issues  
13 identified in Docket No. 930173-TL. These issues  
14 include whether a sufficient community of interest  
15 exists between Haines City and Orlando to justify a  
16 plan that would provide toll relief and what the  
17 revenue impact would be on BellSouth.

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

21  
22 A. The only route involved is Haines City to Orlando.  
23 Orlando is a BellSouth exchange.

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

1  
2 A. No. BellSouth did not conduct traffic studies on the  
3 route from Orlando to Haines City. This is an  
4 interLATA route; Orlando is in the Orlando LATA and  
5 Haines City is in the Gainesville LATA. Data is not  
6 available to BellSouth on interLATA routes. The  
7 Commission has recognized this in other Dockets and  
8 relieved BellSouth of the requirement to file traffic  
9 data on the interLATA route in those Dockets (Docket  
10 No. 941281-TL).

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

17  
18  
19 A. No. In the absence of traffic data, we do not have  
20 any evidence to know whether a sufficient community  
21 of interest exists. We are not aware of any other  
22 significant community of interest consideration that  
23 would justify flat rate EAS.

24  
25 Q. Does BellSouth think that an alternative plan, such

1 as Extended Calling Service (ECS), should be  
2 recommended as a method to provide toll relief?

3

4 A. No. Because this is an interLATA route, BellSouth  
5 would be required to obtain waivers in order to  
6 provide service between Orlando and Haines City. In  
7 the past, the only such waivers that we have been  
8 successful in obtaining are for non-optional flat  
9 rate EAS.

10

11

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

1 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  
8 our access revenue loss. BellSouth would incur  
9 additional cost associated with either leasing or  
10 constructing facilities in order to complete calls  
11 between Orlando and Haines City, since today we are  
12 prohibited from transporting those calls. We can not  
13 estimate this cost since we do not know the traffic  
14 volumes.

15

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

19

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

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Q. Please summarize your testimony.

A. BellSouth does not support non-optional flat rate EAS between Orlando and Haines City. Rule 25-4.060(3) is clear on the traffic and distribution of call requirements. In the absence of traffic and distribution data, we have no way of knowing that these requirements have been met. If the Commission still feels that some toll relief is justified, then we recommend that an alternative plan such as ECS be considered.

Q. Does this conclude your testimony?

A. Yes.