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March 25, 1998

ORIGINAL FILE COPY

IN REPLY REFER TO:

Tallahassee

BY HAND DELIVERY

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

Re: Petition by the residents of Polo Park
requesting extended area service (EAS)
between the Haines City exchange and the
Orlando, West Kissimmee, Lake Buena Vista,
Windermere, Reedy Creek, Winter Park, Clermont,
Winter Garden and St. Cloud exchanges
Docket No. 930173-TL

Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of United Telephone Company of Florida's Prehearing Statement.

We are also submitting the Prehearing Statement on a 3.5" high-density diskette generated on a DOS computer in WordPerfect 5.1 format.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

J. Jeffrey Wahlen

- ACK
- AFA
- APP
- CAF
- CMU
- GTR
- EAG
- LEG
- LIN JJW/csu
- OFC Enclosures
- ROB cc: All parties of record
- SEC utd\930173.by0
- WAS
- OTM

RECEIVED & FILED
FLORIDA BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03517 MAR 25 98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by the residents)
of Polo Park requesting extended)
area service (EAS) between the)
Haines City exchange and the)
Orlando, West Kissimmee, Lake)
Buena Vista, Windermere, Reedy)
Creek, Winter Park, Clermont,)
Winter Garden and St. Cloud)
exchanges)
_____)

DOCKET NO. 930173-TL
Filed: 3/25/96

UNITED'S PREHEARING STATEMENT

Pursuant to the Order on Prehearing Procedure in this docket, United Telephone Company of Florida ("Sprint-United" or the "Company"), through its undersigned counsel, files its Prehearing Statement.

A. **WITNESS:** The companies will offer the prepared direct testimony of Sharon E. Harrell.

B. **EXHIBITS:** None.

C. **BASIC POSITION:** United's basic position is that the calling patterns on the routes in this docket do not meet the existing Commission requirements to qualify for balloting for flat-rate, non-optional EAS, nor are they close enough to warrant any alternative form of toll relief.

DOCUMENT NUMBER-DATE

03517 MAR 25 96

FPSC-RECORDS/REPORTING

D-G. ISSUES AND POSITIONS:

ISSUE 1: Is there a sufficient community of interest on the routes listed in Table A to justify surveying for nonoptional extended area service as currently defined in the Commission rules, or implementing an alternative interLATA toll plan?

Position: No. Commission Rule 25-4.060(3) states that a sufficient community of interest exists when the calling rate exceeds three Messages Per Access Line Per Month (M/A/Ms) and 50% of the subscribers in the exchange make two or more calls per month. Traffic on the routes in this docket does not meet either criteria.

ISSUE 2: What other community of interest factors should be considered in determining if either an optional or nonoptional toll alternative should be implemented on these routes?

Position: Additional community of interest factors often included are the location of schools, fire/police departments, medical/emergency facilities and county government. Haines City is located in Polk County, and such community of interest factors for that exchange reside within that county, therefore, these traditional community of interest factors are not applicable in this docket.

ISSUE 3: If a sufficient community of interest is found on any of these routes, what is the economic impact of each plan on the company (summarize in chart form and discuss in detail)?

- a. EAS with 25/25 plan and regrouping;
- b. Alternative InterLATA toll plan; and
- c. Other (specify)

Position:

- a. Should the Commission determine that flat-rate, non-optional EAS is warranted, the implementation would impact three of the United exchanges. The West Kissimmee, Kissimmee and St. Cloud exchanges would be regrouped from rate group three to rate group four, thus incurring an increase in their basic local service rate.

The impact to the Company of the implementation of EAS would result in a loss of access revenue and an increase in local service revenues, resulting in an average annual revenue gain of \$253,000, which does not reflect the additional costs incurred for facilities that will need to be installed or leased from an IXC, or other administrative costs.

- b. The implementation of ECS impacts only those customers making the calls. Based on the monthly calling volume reflected in the traffic studies, the estimated annual revenue impact to United would be a loss of \$218,000. These dollars do not reflect the additional costs incurred for facilities that will need to be installed or leased from an IXC, or other administrative costs.

ISSUE 4: Should subscribers be required to pay an additive as a prerequisite to surveying for extended area service or an alternative interLATA toll plan? If so, how much of a payment is required and how long should it last?

Position: The routes in this docket do not meet the Commission requirements for any form of toll relief. However, should the Commission determine that EAS is appropriate, the 25/25 Plan with Regrouping should be ordered.

ISSUE 5: If a sufficient community of interest is found, what are the appropriate rates and charges for the plan to be implemented on these routes?

Position: If the Commission finds that a sufficient community of interest exists, Extended Calling Service should be ordered.

ISSUE 6: If extended area service or an alternative interLATA toll plan is determined to be appropriate, should the customers be surveyed?

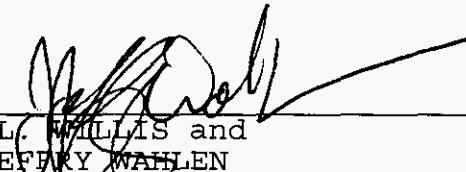
Position: Yes. If a non-optional plan is determined to be appropriate, the subscribers should be surveyed. All subscribers should have a voice in the implementation of such a plan since all subscribers will pay for the plan if implemented.

H. STIPULATIONS: The Companies are not aware of any pending stipulations at this time.

I. PENDING MOTIONS: The Companies are not aware of any pending motions at this time.

J. COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE: The Company does not know of any requirement of the Order on Prehearing Procedure with which it cannot comply.

DATED this 25th day of March, 1996.



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ATTORNEYS FOR UNITED TELEPHONE
COMPANY OF FLORIDA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 25th day of March, 1996, to the following:

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