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ORIGINAL
FILE COPY

July 22, 1996

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

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the
original and fifteen (15) copies of Brief and Posthearing Statement
of Issues and Positions of United Telephone Company of Florida.

We are also submitting the Brief 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

Enclosures
cc: All parties of record

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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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, Kissimmee, West)
Kissimmee, Lake Buena Vista,)
Windermere, Reedy Creek, Winter)
Park, Clermont, Winter Garden)
and St. Cloud exchanges)
_____)

DOCKET NO. 930173-TL
Filed: 7/22/96

**BRIEF AND POSTHEARING STATEMENT
OF ISSUES AND POSITIONS OF
UNITED TELEPHONE COMPANY OF FLORIDA**

United Telephone Company of Florida ("Sprint-United" or the "Company") files this Brief and Posthearing Statement of Issues and Positions.

I.

INTRODUCTION

The proceeding began on February 19, 1993, when certain residents of the Polo Park area filed a petition with the Florida Public Service Commission ("FPSC" or "Commission") seeking non-optional extended area service between the Haines City exchange and the Orlando, Kissimmee, West Kissimmee, Lake Buena vista, Windermere, Reedy Creek, Winter Park, Clermont, Winter Garden and St. Cloud exchanges. This matter was set for hearing by Order No. PSC-95-1396-FOF-TL, issued November 13, 1995.

The Haines City exchange is served by GTFL. United provides service in the Windermere, Reedy Creek, Winter Park, Clermont, Winter Garden, St. Cloud, Kissimmee and West Kissimmee exchanges

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FPSC-RECORDS/REPORTING

and is only interested in the issues in this docket as they relate to the routes including those exchanges.

The final hearing in this docket was held on June 14, 1996 at the Polo Park East Community Building in Davenport, Florida. United sponsored the testimony of Sharon E. Harrell, which was incorporated into the record as though read at Tr. 190-197. Witness Harrell sponsored two exhibits as follows:

<u>No.</u>	<u>Title</u>	<u>Admitted</u>
1	Confidential United Traffic Study	122
7	EEH-1 Composite Exhibit	200

II.

BASIC POSITION

* 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.

III.

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.

Discussion: United's position on this issue is supported by the testimony of Ms. Harrell at Tr. 192-194, and in United's confidential traffic study. See Exhibit 1. As noted by Ms. Harrell, for most of the routes involving United exchanges, over 90% of the residential customers made no calls. Tr. 193.

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. Davenport is in Polk County, and the traditional factors for that exchange reside within that county; therefore, traditional community of interest factors are not present.

Discussion: The Company's position on this issue is supported by the testimony of Ms. Harrell at Tr. 195.

While there was a significant amount of public testimony in support of a toll alternative, that testimony merely reflects the fact that there is a large community of people interested in lower telephone bills -- not a strong community of interest between the Haines City exchange and the exchanges served by United. Indeed, there was little, if any, public testimony regarding the "community of interest" between Haines City and exchanges such as Windermere, Reedy Creek, St. Cloud, Winter Garden, Winter Park and Clermont.

Not surprisingly, these exchanges were at the bottom of Petitioner's prioritized list of exchanges. See Late Filed Exhibit No. 9.

The testimony at the public hearing did not reflect a need to call schools, fire/police departments, medical emergency facilities and/or the county government, but was strongly in support of the need to call nearby neighbors, doctors, places of business and employment. It would appear that if any form of toll relief is being considered, it should include only those nearby exchanges for which community of interest testimony was presented. The United exchanges involved would include Kissimmee, West Kissimmee, Reedy Creek and Clermont. While the Company understands customer interest in lower toll bills, the fact that there are a group of organized customers who want lower toll bills does not by itself suggest that there is a community of interest sufficient to warrant a toll alternative.

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. The West Kissimmee, Kissimmee and St. Cloud exchanges would be regrouped from rate group three to rate group four. There would be an average annual revenue gain of \$253,000, which

does not reflect the additional costs incurred for facilities or other administrative costs.

- b. The estimated annual revenue impact to United would be a loss of \$218,000, 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.

Discussion: United's position on this issue is supported on the record in Exhibit No. 1 (Confidential) and at TR 195.

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.

Discussion: United's position on this issue is supported on the record at Tr. 196-A and 197.

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.

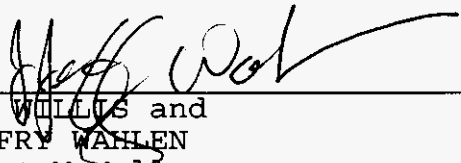
Discussion: United's position on this issue is supported on the record at Tr. 196-A and 197.

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.

Discussion: United's position is consistent with the Commission's rules and practices in other cases.

DATED this 22nd day of July, 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 22nd day of July, 1996, to the following:

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