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July 24, 1996

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

- ACK _____
- AFA _____
- APP _____
- CAF _____ Re. Docket No. 910529-TL
- CMU _____ Request by Pasco County Board of County Commissioners for extended area service between all Pasco County exchanges
- CTR _____
- EAG _____ Re: Docket No. 920642-TL
- LEG 1 _____ Resolution by City Council of Port Richey for extended area service between the Hudson exchange and Tarpon Springs, Clearwater, St. Petersburg and Tampa exchanges; also between the New Port Richey and Clearwater, St. Petersburg, and Tampa exchanges
- LIN _____
- OPC _____
- RCH _____
- SEC 1 _____ Re: Docket No. 930172-TL
- WAS _____ Petition by residents of Boca Grande requesting extended area service between Boca Grande and North Ft. Myers, North Port, Venice, Englewood, Pine Island, North Cape Coral, and Cape Coral
- OTH Sandy - 1

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's Petition for Temporary Waiver and Implementation Extension in the above matters.

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

A part of GTE Corporation

DOCUMENT NUMBER-DATE


07771 JUL 24 1996

FPSC-RECORDS/REPORTING

Ms. Blanca S. Bayo
July 24, 1996
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Service has been made as indicated on the Certificate of Service. If there are any questions with regard to this matter, please contact the undersigned at 813-228-3087.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Anthony P. Gillman".

Anthony P. Gillman

APG:tas
Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request by Pasco County Board of County Commissioners for extended area service between all Pasco County exchanges)	Docket No. 910529-TL Filed: July 24, 1996
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In re: Resolution by City Council of Port Richey for extended area service between the Hudson exchange and Tarpon Springs, Clearwater, St. Petersburg, and Tampa exchanges; also between the New Port Richey and Clearwater, St. Petersburg, and Tampa exchanges)	Docket No. 920642-TL
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In re: Petition by residents of Boca Grande requesting extended area service (EAS) between Boca Grande and North Ft. Myers, North Port, Venice, Englewood, Pine Island, North Cape Coral, and Cape Coral)	Docket No. 930172-TL

**GTE FLORIDA INCORPORATED'S PETITION FOR
TEMPORARY WAIVER AND IMPLEMENTATION EXTENSION**

By Order number PSC-96-0557-FOF-TL (Order) in these dockets, GTE Florida Incorporated (GTEFL), BellSouth and United were ordered to implement extended calling service (ECS) on a number of interLATA routes. The routes at issue in this filing are Tampa-North to San Antonio and Dade City, respectively, and Tampa-Central to San Antonio and Dade City, respectively and Boca Grande to Englewood. Both Tampa exchanges and Englewood are GTEFL's. San Antonio, Dade City and Boca Grande are served by United.

Because of certain switch limitations, GTEFL finds it necessary to seek a temporary waiver of the requirement to maintain the status quo on carriage of interexchange traffic

on one small portion of the Tampa-Central routes. To allow for the protest period of the PSC's order regarding the waiver petition to run its course, GTEFL believes an extension of the implementation date for ECS on the Company's Tampa-North, Tampa-Central and Englewood ECS routes is also warranted.

In the Order, the Commission found it "appropriate to allow interexchange carriers (IXCs) to continue to carry the same types of traffic on these routes that they are now authorized to carry." (Order at 6.) This condition means that, despite the existence of ECS, customers would still be able to direct their calls on these routes to the desired interexchange carrier, either through the use of presubscribed 1+ (area code and number) or 10XXX dialing. (The call would go to the local exchange carrier (LEC) if the customer used just the area code and number.)

GTEFL, however, cannot comply with this condition with regard to the small part of the Tampa-Central exchange served by the Hyde Park central office. That central office uses DMS 100 switch technology. That technology will not permit the customer to dial their interLATA carrier through the "1+" or 10XXX prefixes and also take advantage of the ECS toll relief (through 10-digit dialing) that the Commission has ordered. Likewise, 0+ ten-digit calls will not be able to go to the LEC if the switch is programmed to accept 1+ or 10XXX calls to the IXC.

In other words, the former toll calls on this part of the Tampa-Central route can all go to either the LEC as ECS or to the IXC as toll, but not both. If GTEFL makes the modifications to comply with the directive that IXCs be able to carry these same calls, it will

violate the Order establishing ECS, because customers in this area will not get the benefit of ECS.

GTEFL thus asks for a waiver of the requirement to maintain the interexchange carriage status quo. This would mean that, for a limited time, customers served by the Hyde Park Central office would not be able to use 1+ or 10XXX to direct calls on the ECS routes to their designated IXC. These calls would all be carried by GTEFL and rated as ECS calls. Customers would, however, still have the ability to reach their IXCs through other dialing patterns, such as 700 and 800 codes.

GTEFL believes that its request for exemption from the IXC carriage condition is not unduly prejudicial to either customers or to the IXCs. Only a very small percentage--4.5%--of the total of about 510,000 access lines in the Tampa Central exchange would be affected. The projected release date of the software from the manufacturer is December, 1996. The estimated in-service date is fourth quarter, 1997 which will allow the LEC time to purchase, install and test the software. In the meantime, customers will still be able to reach IXCs, if they wish to do so, through use of access codes other than 10XXX or 1+. These other types of codes that have become increasingly common among IXCs.

In addition to the temporary waiver of the interexchange carriage condition, GTEFL believes a brief delay in implementation of all the Tampa routes and the Englewood route is warranted. The Order directs ECS implementation by the end of October 1996. Given Commission and Company time frames associated with this waiver, GTEFL will not be able to meet the October deadline. Based on discussions with Commission Staff, the August 13 agenda is the earliest GTEFL's waiver request can be addressed. An Order should be

issued 20 days from then. A protest period of another 20 days will follow. Assuming no protests are filed, GTEFL will need 30 days to prepare customer notifications, and another 30 days to send such notifications to all customers involved. Given these necessary steps, GTEFL believes a brief extension of about six weeks—until December 11, 1996, would be justified. If GTEFL is compelled to go ahead with implementation before it knows the status of the waiver request, there is a risk that GTEFL will unnecessarily waste resources in preparing customer notification materials that may later turn out to be inconsistent with action the Commission takes on the waiver.

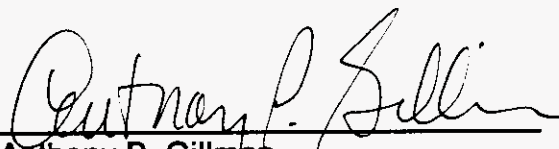
The brief implementation delay is necessary, moreover, because the same switch limitations that prompt this waiver request also apply to United. Both of United's San Antonio and Dade City offices are served by DMS 100 technology and their Boca Grande office is served by an Alcatel 1210 switch. In conversations with United, GTEFL has learned that United will also experience the same problem with the Boca Grande office and United will address this problem in their waiver request.

While GTEFL could implement the other routes not involving Hyde Park office sooner, GTEFL believes it would not be in the best interest of its subscribers. GTEFL does not believe the Commission intends for implementation of only one-way ECS on the GTEFL routes. Yet this will be the outcome if GTEFL is not allowed to delay implementation to permit both it and United to allow for the protest period associated with the Commission's order on the waiver request to expire and allow the Companies the time required to complete the appropriate customer notification. The result will be customer confusion and irritation. To avoid this effect, GTEFL asks the Commission for an

extension of the implementation date on all the Tampa routes and the Englewood route until December 11, 1996.

For all the reasons discussed in this filing, GTEFL asks for a partial, temporary waiver of the requirement that IXCs continue to carry the same types of traffic on the ECS routes that they are now authorized to carry. This waiver would apply only to the portion of the Tampa-Central routes served by the Hyde Park central office, and would last until GTEFL can deploy new switch enhancements in fourth quarter of 1997. In addition, GTEFL requests that the implementation date of October 22, 1996 for all the Tampa ECS routes and the Englewood route be changed to December 11, 1996.

Respectfully submitted on July 24, 1996




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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of GTE Florida Incorporated's Petition for Temporary Waiver and Implementation Extension in Docket Nos. 910529-TL, 920642-TL and 930172-TL has been furnished via U.S. mail the 24th day of July, 1996 to the parties on the attached list.



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