

NANCY B. WHITE
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404)335-0710

ORIGINAL
FILE COPY

February 24, 1997

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

RE: Docket No. 920260-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Reconsideration of Order No. PSC-97-0128-FOF-TL. Please file these documents 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 on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
(PW)

Nancy B. White

- ACK _____
- AFA 1 _____
- APP _____
- CAF _____
- CMU** _____
- CTR _____
- EAG _____ Enclosures
- LEG 1 _____
- LIN 5 _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH _____

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

02066 FEB 24 5

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone and Telegraph)
Company)
_____)

Docket No. 920260-TL

Filed: February 24, 1997

ORIGINAL
FILE COPY

BellSouth Telecommunications, Inc.'s
Motion for Reconsideration/Clarification

BellSouth Telecommunications, Inc. ("BellSouth"), files pursuant to Rule 25-22.060, Florida Administrative Code, its Motion for Reconsideration/Clarification of Order No. PSC-97-0128-FOF-TL ("Order"), issued on February 7, 1997, by the Florida Public Service Commission ("Commission") in the above referenced docket. In support of its Motion for Reconsideration/Clarification, BellSouth states the following:

1.

This docket was initiated pursuant to Order No. 25552 (issued December 31, 1991) to analyze and evaluate the rate stabilization Plan under which BellSouth Telecommunications, Inc. ("BellSouth") had operated since 1988. On January 5, 1994, BellSouth and the Office of Public Counsel ("OPC" or "Public Counsel") jointly filed a document entitled, Stipulation and Agreement Between The Office of Public Counsel and Southern Bell Telephone and Telegraph Company. On January 12, 1994, BellSouth filed a document entitled, Implementation Agreement for Portions of the Unspecified Rate Reductions in Stipulation and Agreement Between The Office of Public Counsel and Southern Bell Telephone Company. On February 11, 1994, the Florida Public Service Commission ("Commission") entered Order No. PSC-94-0172-

DOCUMENT NUMBER-DATE
02066 FEB 24 97
FPSC-RECORDS/REPORTING

FOF-TL, Order Approving Stipulation and Implementation Agreement. The Settlement provided for various specified and unspecified revenue reduction amounts in 1995 and 1996.

2.

The Implementation Agreement stated that the Commission would “conduct hearings to determine the rate design by which the amounts not specifically allocated by the Stipulation and [the] Implementation Agreement shall be disposed of in ...1996...” (Implementation Agreement, Par. 10, pp. 7-8). The Agreement further stated that “the PARTIES [to the Agreement] or any other interested persons shall submit, not less than 120 days prior to the scheduled effective date of each reduction, their proposals as to how such reductions should implemented.” (Implementation Agreement, Par. 4 pp. 11-12).

3.

On May 31, 1996, BellSouth filed revisions to its General Subscribers Service Tariff, its Private Line Service Tariff, and its Access Service Tariff, to use the unspecified revenue reduction to fund the reduction in 1996 rates of various features and services. Proposals of alternative ways to allocate the 1996 million revenue reduction were filed by the Office of Public Counsel, the Florida Interexchange Carriers Association (“FIXCA”)¹, Florida Cable Telecommunications Association (“FCTA”), and Palm Beach Newspapers, Inc. (“PBN”).

4.

On February 7, 1997, the Commission issued Order No. PSC-97-0128 (“Order”) holding that BellSouth be required to eliminate the Residual Interconnection Charge (“RIC”) and reduce

¹ FIXCA filed a Joint Proposal on behalf of its members and AT&T Telecommunications of the Southern States, Inc. (“AT&T”), MCI Telecommunications Corporation (“MCI”), Sprint Communications Company Limited Partnership (“Sprint”), Florida Ad Hoc Telecommunications Association, Inc. (“Ad Hoc”), McCaw Communications (“McCaw”), and the Department of Defense (“DOD”).

the Carrier Common Line Charge ("CCLC"). The rate reduction to eliminate the RIC was estimated to be \$34.3 million and the rate reduction required to reduce the CCL was estimated to be \$3.3 million. The Commission relied on forecasted estimates of demand for an eighth month period of 1996 in reaching a decision on these rate reductions. BellSouth has performed an updated forecast demand for the entirety of 1996 that affects the revenue reductions required to eliminate the RIC and therefore, seeks reconsideration/clarification as to the amounts required to eliminate the RIC and reduce the CCL.

5.

In Interrogatories served by the Commission Staff on BellSouth during the pendency of this docket, BellSouth furnished a forecast for the revenue impact of the RIC for the period of February through September of 1996. This forecast showed a revenue impact of \$34,312,104.00. Upon receipt of the Order, BellSouth performed an updated forecast for the RIC using the most current data for the entire year of 1996. This updated report shows a revenue impact of \$35,027,252.00 for the RIC, a difference of \$715,148.00.

6.

Based on the updated forecast and revenue projections for the RIC, BellSouth seeks reconsideration of the amount by which BellSouth was ordered to reduce the CCL. The Order states that the CCL is to be reduced by \$3.3 million. BellSouth seeks to reduce this amount by the \$715,148.00 to reflect the difference between the original RIC price out and the updated price out. Under BellSouth's request, the CCL would be reduced by approximately \$2.58 million.

7.

BellSouth also seeks Reconsideration/Clarification of the pro rated portion of \$40.70 million subject to refund. BellSouth feels that the refund amount should be reduced by the portion of the \$1.1 million ECS credit that was already in effect by 10/1/96. This will reduce the refund amount by approximately \$.5 million.

8.


BellSouth believes its request is fair and reasonable and will not prejudice any of the parties to this docket.

WHEREFORE, BellSouth requests that its Motion for Reconsideration/Clarification be granted and that the Commission adopt BellSouth's position on the issue discussed herein.

Respectfully submitted this 24th day of February, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.


ROBERT G. BEATTY
J. PHILLIP CARVER
c/o Nancy Sims
150 South Monroe Street, #400
Tallahassee, Florida 32301
(305)347-5555


WILLIAM J. ELLENBERG II
NANCY B. WHITE
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404)335-0710

CERTIFICATE OF SERVICE

Docket No. 920260-TL

Docket No. 900960-TL

Docket No. 910163-TL

Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been

furnished by United States Mail this 24th day of February, 1997 to:

Robin Norton
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Martha Brown
Division of Legal Services
Florida Public Svc. Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff & Reeves
117 South Gadsden Street
Tallahassee, FL 32301

Kenneth A. Hoffman
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
101 N. Monroe Street
Suite 200
Tallahassee, Florida 32301

Dan B. Hendrickson
Post Office Box 1201
Tallahassee, FL 32302

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Michael J. Henry
MCI Telecommunications Corp.
780 Johnson Ferry Road
Suite 700
Atlanta, Georgia 30342

Richard D. Melson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, Florida 32314

Rick Wright
Regulatory Analyst
Division of Audit and Finance
Florida Public Svc. Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Laura L. Wilson, Esq.
Florida Cable Telecommunications
Assn., Inc.
310 North Monroe Street
Tallahassee, FL 32301

Benjamin W. Fincher
Sprint Communications Co.
Limited Partnership
3100 Cumberland Circle, #802
Atlanta, GA 30339

Benjamin H. Dickens, Jr.
Blooston, Mordkofsky,
Jackson & Dickens
2120 L Street, N.W.
Washington, DC 20037

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Ervin
305 South Gadsden Street
Post Office Drawer 1170
Tallahassee, Florida 32302

Angela Green
Florida Public
Telecommunications Assn., Inc.
125 South Gadsden Street
Suite 200
Tallahassee, FL 32301

Monte Belote
Florida Consumer Action Network
4100 W. Kennedy Blvd., #128
Tampa, FL 33609

Joseph Gillan
J.P. Gillan & Associates
P.O. Box 541038
Orlando, FL 32854-1038

Mark Richard
Attorney for CWA
Locals 3121, 3122, and 3107
304 Palermo Avenue
Coral Gables, FL 33134

Marsha E. Rule
Wiggins & Villacorta P.A.
501 East Tennessee St.
Suite B
P.O. Drawer 1657
Tallahassee, FL 32302

Marilyn Lenard
Council of Florida AFL-CIO
135 S. Monroe Street
Tallahassee, FL 32301

David Larimer
P.O. Box 419000
Melbourne, FL 32941

Michael Gross
Department of Legal Affairs
The Capitol, PL-01
Tallahassee, FL 32399

Mr. Douglas S. Metcalf
Communications Consultants, Inc.
631 S. Orlando Ave., Suite 450
P. O. Box 1148
Winter Park, FL 32790-1148

Mr. Cecil O. Simpson, Jr.
Mr. Peter Q. Nyce, Jr.
Department of the Army
901 North Stuart Street, #400
Arlington, VA 22203

Mr. Michael Fannon
Cellular One
2735 Capital Circle, NE
Tallahassee, FL 32308

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman & Metz
Post Office Box 1876
Tallahassee, FL 32302-1876

Stan Greer
Division of Communications
Florida Public Svc. Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Patricia Kurlin
Intermedia Communications Inc.
9280 Bay Plaza Boulevard, #720
Tampa, FL 33619

Susan Weinstock
Department of State Legislation
601 E. Street, NW
Washington, DC 20049

Mark Logan
201 S. Monroe Street, #500
Tallahassee, FL 32301

Dan Shorter
P.O. Box 24700
West Palm Beach, FL 33416

Robin Dunson
1200 Peachtree Street
Promenade I, Room 4038
Atlanta, GA 30309

William H. Higgins, Esq.
AT&T Wireless Services of
Florida, Inc.
250 S. Australian Avenue
W. Palm Beach, FL 33401

Nancy B. White (pm)