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October 22, 1997

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

Re: Docket No. **970644-TP**
Docket No. 970744-TP

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's Request for Temporary Waiver of Toll Limitation Requirement in the above matters. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at (813) 483-2617.

ACK _____

AFA Very truly yours,

APP _____

CAF _____

CMU Kimberly Caswell

CTR _____

EAG KC:tas

LEG Enclosures

LIN 5

OPC _____

RCH _____

SEC 1

WAS A part of GTE Corporation

OTH _____

RECEIVED & FILED

[Signature]
FPC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPC RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Establishment of Eligible Telecommunications)
Carriers Pursuant to Section 214(e) of the)
Telecommunications Act of 1996)

Docket No. 970644-TP
Filed: October 22, 1997

Implementation of Changes in the Federal)
Lifeline Assistance Program Currently)
Provided by Telecommunications Carriers)
of Last Resort)

Docket No. 970744-TP

**GTE FLORIDA INCORPORATED'S REQUEST FOR
TEMPORARY WAIVER OF TOLL LIMITATION REQUIREMENT**

In Order No. PSC-97-1262-FOF-TP issued October 14, 1997 in these Dockets (Order), this Commission designated Florida incumbent local exchange carriers (ILECs), including GTE Florida Incorporated (GTEFL), "eligible telecommunications carriers" (Eltels) for purposes of receiving federal universal service support. Toll limitation for Lifeline customers is among the services the FCC has required Eltels to provide. This Commission, however, has correctly recognized that some ILECs do not have the existing capability to provide toll limitation service to Lifeline customers. (Order at 7.) Because the FCC is also aware that toll limitation capability may not be uniformly available, it has authorized state commissions to grant carriers toll limitation waivers until the necessary switch upgrades can be made to provide this service. Federal-State Joint Board on Universal Service, Report and Order, FCC 97-157, CC Dkt. No. 96-45 at para. 388 (May 8, 1997).

DOCUMENT NUMBER-DATE

10833 OCT 22 97

FPSC RECORDS/REPORTING

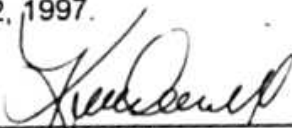
GTEFL is among the designated EITels that lack the existing capability to provide toll limitation service. The software and processing system modifications needed to support toll limitation for only Lifeline customers will not be completed by January 1, 1998, the date the FCC has set for availability of supported services. In addition, a toll limitation process is effective only to the degree that toll providers supply rated toll billing records to GTEFL on a timely basis for inclusion in the customers' incurred balances and comparison to account credit limits. This practice is not common in the industry at this time. As such, GTEFL asks this Commission to grant it a waiver of the toll limitation requirement until GTEFL can make the technical and other changes needed to provide this service. Specifically, GTEFL asks the Commission to waive the toll limitation requirement for a period of one year, to January 1, 1999. This waiver request necessarily includes the directory advertising condition imposed by this Commission. (Order at 5.) Customer notification of voluntary toll limitation service would not be appropriate (and, indeed, would only confuse consumers) if it is done before the service is actually available.

In the interim, GTE will give Lifeline customers the option of subscribing to toll blocking at no charge in lieu of posting a deposit for service. These customers will be permitted to convert from either the toll blocking or security deposit programs to the toll limitation service at no charge when that service becomes available.

For all the reasons discussed in this filing, GTEFL asks the Commission to approve its request to waive the Lifeline toll limitation requirement for a one-year period, to January 1, 1999. This waiver period is well under the two-year maximum (with possible renewals) waiver period the FCC has prescribed for the states.

Respectfully submitted on October 22, 1997.

By:



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of GTE Florida Incorporated's Request for Temporary Waiver of Toll Limitation Requirement in Docket No. 970644-TP was sent via overnight delivery on October 21, 1997 to:

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Office of Public Counsel
111 West Madison Street, Suite 812
Tallahassee, FL 32399-1400



Kimberly Caswell