

YOUNG, VAN ASSENDERP & VARNADOE, P. A.  
ATTORNEYS AT LAW

ORIGINAL

REPLY TO:

R. BRUCE ANDERSON  
TASHA O. BUFORD  
DAVID B. ERWIN  
DAVID P. HOPSTETTER\*  
C. LAURENCE KEESEY  
ANDREW I. SOLIS  
KENZA VAN ASSENDERP  
GEORGE L. VARNADOE  
ROY C. YOUNG

Tallahassee

October 24, 1997

GALLIE'S HALL  
225 SOUTH ADAMS STREET, SUITE 200  
POST OFFICE BOX 1833  
TALLAHASSEE, FLORIDA 32302-1833  
TELEPHONE (904) 222-7206  
TELECOPIER (904) 561-6834

SUNTRUST BUILDING  
801 LAUREL OAK DRIVE, SUITE 300  
POST OFFICE BOX 7907  
NAPLES, FLORIDA 34101-7907  
TELEPHONE (941) 597-2814  
TELECOPIER (941) 597-1060

\*BOARD CERTIFIED REAL ESTATE LAWYER

WILLIAM J. ROBERTS  
OF COUNSEL

Ms. Blanca Bayo  
Clerk, Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee, Florida 32399-0850

In re: GTC, Inc. - Request for Waiver - Docket No 970744-TP-Order No. PSC-97-1262-FOF-TP

Dear Ms. Bayo:

Commission Order PSC-97-1262-FOF-TL requires each Eligible Telecommunications Carrier (ETC) to make toll limitation services available to customers on a voluntary basis and at no charge. If any ETC is unable to provide toll limitation services now, the order allows such an ETC to file implementation plans and a request for waiver by October 23, 1997.

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU Mark  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG 1  
LIN 5  
OPC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC 1  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

GTC, Inc. is prepared to offer toll blocking at this time. However, GTC, Inc. believes that virtually no LEC in the nation is capable of providing toll limitation service as the FCC has defined it. The toll limitation services requirement was apparently added by the FCC at the final stage of the federal rulemaking without much, if any, comment by LECs. GTC, Inc. believes that this misunderstanding regarding rational expectations of LEC capabilities has now been explained to FCC staff, and the issue could be reevaluated by the FCC.

Please accept this letter on behalf of GTC, Inc. as a Request for Waiver of the requirement of GTC, Inc. to provide toll limitation services.

GTC, Inc. is unable to provide an implementation plan for toll limitation services until GTC, Inc. can accomplish the following:

1. Determine the feasibility and technical capabilities of GTC Inc.'s switch with regard to the installation of toll limitation services. Such toll limitation services would require real-time

DOCUMENT NUMBER-DATE  
11014 OCT 24 97  
FPSC-RECORDS/REPORTING

Ms. Blanca Bayo  
October 24, 1997  
Page Two

capability to record and rate every call instantaneously as the caller attempts to make a toll call. The ability to provide this service would also require the capability of differentiating between toll calls and other types of calls.

2. Determine the availability of and timing for receipt of reimbursement of costs for the incremental cost of switch upgrading and the cost of the incremental cost study.

As soon as implementation plans for switch upgrading to provide toll limitation services have been formulated, GTC, Inc. will notify the Commission, provided that the FCC does not reconsider the requirement before then.

Sincerely,



David B. Erwin

DBE/kdr  
cc: Ann Marsh  
Lynda Bordelon