

AUSLEY & McMULLEN

ORIGINAL

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(904) 224-9115 FAX (904) 222-7560

October 31, 1997

BY HAND DELIVERY

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

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

Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of Vista-United's Implementation Plan.

We are also submitting the Implementation Plan on a 3.5" high-density diskette generated on a DOS computer in WordPerfect 5.1 format.

ACK _____ Please acknowledge receipt and filing of the above by stamping
AFA _____ the duplicate copy of this letter and returning the same to this
APP _____ writer.

CAF _____ Thank you for your assistance in this matter.

CMU _____

CTR _____

EAG _____

LEG 1 _____

LIN _____ Enclosures

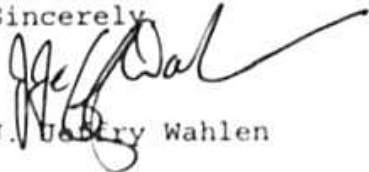
OPC _____

RCH _____ cc: All parties of record

SEC 1 _____ yat\970744.byo

WAS _____

OTH _____

Sincerely,

J. Gregory Wahlen

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FPSC - BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
11236 OCT 31 5
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Establishment of eligible telecommunications carriers pursuant to Section 214(e) of the Telecommunications Act of 1996.

In re: Implementation of changes in the Federal Lifeline Assistance Plan currently provided by telecommunications carriers of last resort.

DOCKET NO. 970744-TP
FILED: October 31, 1997

VISTA-UNITED'S IMPLEMENTATION PLAN

Pursuant to Order No. PSC-97-1261-FOF-TP, and Rule 25-22.037(2), F.A.C., and its Motion for Extension of Time, VISTA-UNITED TELECOMMUNICATIONS ("Vista"), submits the following toll limitation implementation plan:

Introduction

1. On October 23, 1997, Vista requested a waiver of the requirement to provide full toll limitation services. In addition, it requested an extension of time to submit an implementation plan.

2. Vista has further investigated the steps necessary to implement full toll limitation services as set forth in the FCC's Order. Vista is currently offering Toll Blocking in all of its exchanges, but does not and cannot offer Toll Control as defined in the FCC Order. Accordingly, Vista does not need a waiver of the FCC's Toll Limitation Requirements as they relate to Toll Blocking. Vista's position on Toll Control is set forth below.

Toll Control

3. Vista has several interexchange carriers operating in its

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FPSC-RECORDS/REPORTING

exchanges in Florida. Currently, each of those IXCs rates its own toll calls and only forwards the rated messages to Vista if Vista bills for that IXC. If Vista bills for the IXC, the transfer of records is not done on a real time, on-line basis but usually results in a significant lag between the time when the toll call occurred and when Vista receives the rated message. For Vista to rate IXC's toll for low income subscribers on a real time basis, each toll message would have to be instantaneously transferred from Vista's switch to Vista's data center for processing. Vista would then need the capability to apply the tariff rates and conditions for each of the IXCs. This is not the way the rating process currently works.

4. The same problems exist for LEC provided intraLATA toll.

5. To implement Toll Control as envisioned by the FCC, a new process will need to be developed. IXCs would need to receive and rate each message and then transfer the resulting charge for each toll message to the responsible LEC on a real time basis. LEC provided intraLATA toll would also need to be rated on a real time basis. The responsible LEC would then have to accumulate each customer's IXC and LEC provided toll on a real time basis and compare the results to the preset limit on toll for low income subscribers. Once the limit is reached, the low income subscriber's ability to make toll calls would need to be discontinued on a real time basis. This would take a nationwide network similar to the one being established for local number portability; however, doing so would be more complex since it would

require many more processes than "simple" number portability.

6. Based on Vista's investigation, it is clear that the systems and technology necessary to implement Toll Control are not available. The cost of developing the technology and systems will be staggering. Vista is not aware of any plans to develop these systems and does not anticipate the development of the necessary technology and systems in the foreseeable future. Accordingly, Vista suggests that the FPSC grant a blanket waiver for the Toll Control requirement pending development of the necessary technology and systems.

7. Vista further understands that the FCC is or will soon be in the process of reconsidering its Order as it relates to Toll Control.

8. Accordingly, with this as background, Vista proposes to take the following steps:

(a) Continue offering Toll Blocking to its customers in accordance with its FPSC approved tariffs.

(b) Continue monitoring the activity of the FCC to determine whether it will reconsider its Order as it relates to Toll Control.

(c) Advise the FPSC and its Staff when and if the technology and systems necessary to provide Toll Control become available.

(d) If the FCC does not reconsider its Order as it relates to Toll Control, and the technology and systems necessary to implement Toll Control become available, determine (1) the incremental costs of implementing Toll Control, (2) the availability of and timing for receipt of reimbursement of the incremental costs of the

implementation of Toll Control, and (3) market demand for Toll Control services.

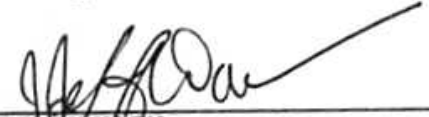
(e) Once those determinations have been made, prepare a time table for implementing Toll Control in portions of its territory where it makes economic sense to do so in light of the incremental costs and market demand for the service.

(f) Submit the time table to the FPSC for its review and consideration.

(g) Cooperate with the FPSC and its staff as the FPSC attempts to implement the Toll Limitation Requirements in the FCC Order.

DATED this 31st day of October, 1997.

Respectfully submitted,



J. JEFFRY WAHLEN
LEE L. WILLIAMS
Ausley & McMullen
Post Office Box 391
Tallahassee, FL 32302
(850) 224-9115

ATTORNEYS FOR VISTA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been served by U. S. Mail or hand delivery (*) on this 31st day of October, 1997 to the following:

Mr. Will Cox*
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Ms. Ann Marsh*
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

ATTORNEY



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