

ORIGINAL

Legal Department

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December 29, 1997

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 930235-TL (EAS Taylor County)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Prehearing Statement, which we ask that you file in the above-captioned matter.

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 to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White (NW)

NBW/vf

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

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**CERTIFICATE OF SERVICE
DOCKET NO. 930235-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served
by U.S. Mail this 29th day of December, 1997 to the following:

Beth Culpepper
Staff Counsel-FPSC
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Tel No. (850) 413-6212

GTC, Inc.
c/o St. Joe Communications, Inc.
Mr. Bill Thomas
P.O. Box 220
Port St. Joe, FL. 32456-0220
Tel. No. (850) 229-7324
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Steinhatchee Community Projects
Board, Inc.
P.O. Box 736
Steinhatchee, FL 32359
Fax. No. (352) 498-5555

Taylor County Board of Comm.
P.O. Box 620
Perry, FL 32347-0620

David B. Erwin, Esq.
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Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Resolution By The) Docket No. 930235-TL
TAYLOR COUNTY BOARD OF COMMISSIONS)
For Countywide Extended Area)
Service (EAS) within Taylor County)
_____) Filed: December 29, 1997

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
PREHEARING STATEMENT**

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with Order No. PSC-97-1382-PCO-TL, issued October 31, 1997, hereby submits its Prehearing Statement:

A. Witnesses

BellSouth intends to call the following witness to offer testimony on the issues indicated below:

<u>Witness</u>	<u>Issues Addressed</u>
Nancy H. Sims	All issues

BellSouth reserves the right to call rebuttal witnesses, witness to respond to Commission inquiries not addressed through direct testimony and witnesses to address issues not presently designated, which may be designated at the prehearing conference to be held on January 9, 1998, or thereafter by the Prehearing Officer.

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B. EXHIBITS

BellSouth will provide one exhibit to be identified as NHS-1 which will set forth an estimate of costs for provisioning service to the Taylor County pocket. BellSouth, however reserves the right to file exhibits to any additional testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross examination, impeachment, or any other purpose authorized by the Florida Rules of Evidence and the Rules of this Commission.

C. STATEMENT OF BASIC POSITION

The routes at issue in this docket that involve a BellSouth exchange are the Cross City to Keaton Beach and the Cross City to Perry routes; Cross City is a BellSouth exchange. Because these are interLATA routes, BellSouth has no traffic data. Without this data, BellSouth cannot take a position as to whether a sufficient community of interest exists to justify surveying for non-optional flat rate Extended Area Service (EAS). BellSouth does not recommend that Extended Calling Service (ECS) be adopted by the Commission as an alternative toll plan because the provision of ECS requires an FCC waiver; the FCC has clearly indicated that the only form of waiver it will approve are for non-optional flat rate EAS. Accordingly, if the Commission finds a sufficient community of interest to exist and if BellSouth were ordered to provide flat rate EAS, one alternative would be to utilize the 25/25 plan with regrouping.

D. BELL SOUTH'S POSITION ON THE ISSUES

Issue 1: Is there a sufficient community of interest on the Cross City (Taylor County pocket)/Keaton Beach, and Cross City (Taylor County pocket)/Perry routes to justify surveying for nonoptional extended area service as currently defined in the Commission rules or implementing an alternative interLATA toll plan?

Position: BellSouth has no position as to whether non-optional, flat rate EAS is appropriate. In the absence of traffic data, BellSouth can reach no conclusion as to whether a community of interest exists. If the Commission orders an alternative plan, BellSouth believes the 25/25 plan with regrouping would be the most appropriate alternative.

Issue 2: If a sufficient community of interest is found on either of the routes identified in Issue 1, what is your position regarding each of the following plans (summarize in chart form and discuss in detail) and how should they be implemented?

- a) EAS with 25/25 plan and regrouping;
- b) Alternative InterLATA toll plan; and
- c) Other (specify)

Position:

Plan	Position
EAS with 25/25 plan and regrouping	Appropriate
Alternative InterLATA toll plan	Inappropriate
Other	Inappropriate

If a sufficient community of interest is found to exist, the only type of waiver that BellSouth could obtain from the FCC is for non-optional flat rate EAS. See Statement of Basic Position. Because Cross City customers (located in the 352 Numbering Plan area (NPA)) versus Keaton Beach and Perry customers (located in the 850 NPA) do not share a common NPA, it would be difficult to provide 7-digit dialing on these routes and customer confusion could occur. Based on Commission Order No. PSC-96-0558-FOF-TP in Docket No. 960090-TP (addressing appropriate dialing patterns for various local and toll scenarios) the recommended dialing pattern for inter and intra NPA EAS is 10-digits. Therefore, if flat rate EAS is ordered on these routes, 10 digit dialing should be required.

Issue 3: Should subscribers be required to pay an additive as a prerequisite to surveying for flat rate, two way nonoptional extended area service? If so, who should pay the additive, how much of a payment is required, and how long should it last?

Position: Yes. If this Commission orders flat rate, non-optional EAS, the subscribers in the pocket area should be required to pay an additive sufficient to allow BellSouth to recover the costs of implementing the plan. The most commonly used type of additive in recent years has been the 25/25 plan with regrouping. Because this EAS request involves a pocket, and, as noted in BellSouth's prefiled direct testimony, there could be additional costs associated with providing EAS to an interLATA pocket, the amount of the additive should more directly reflect the actual costs to provide the EAS. The additive should remain in effect for a sufficient period of time to allow for the recovery of costs incurred by BellSouth.

Issue 4: If a sufficient community of interest is found, what are the appropriate rates and charges for any alternative plan and how should it be implemented on either of the routes identified in Issue 1?

Position: BellSouth is in the process of developing the costs for providing the facilities for EAS to the pocket area. These costs will be filed in this docket as an exhibit to testimony prior to the hearings. The Commission should consider these costs in deciding upon the appropriate additive, but, at a minimum, the following rates are proposed for the BellSouth pocket area of Taylor County for calling into Keaton Beach and Perry utilizing the 25/25 plan with regrouping (Cross City will be regrouped from Rate Group 2 to Rate Group 3):

<u>Class of Service</u>	<u>Present Rate</u>	<u>Proposed Rate</u>	<u>25/25 Additive</u>	<u>Total Rate</u>
Residence	\$ 7.70	\$ 8.10	\$2.03	\$10.13
Business	\$20.80	\$21.90	\$5.48	\$27.38
PBX Trunk	\$35.36	\$37.23	\$9.31	\$46.54

Issue 5: If EAS or any alternative plan is determined to be appropriate, which customers should be surveyed?

Position: With a typical EAS request, the entire Cross City exchange would be surveyed. But, in this case, if the Commission decides that there is sufficient community of interest to survey for non-optional EAS, then the pocket area of Taylor county in BellSouth's territory should be surveyed.

E. STATEMENT OF QUESTION OF LAW

BellSouth is not aware of any question of law in this docket.

F. STATEMENT OF POLICY QUESTION AT ISSUE

BellSouth is not aware of any policy question at issue in this docket.

G. STIPULATIONS

BellSouth is not aware of any stipulations between the parties in this proceeding.

H. PENDING MOTIONS FILED BY BELLSOUTH

There are no currently pending motions filed by BellSouth

I. OTHER REQUIREMENTS

BellSouth knows of no requirement set forth in the Prehearing Order with which it cannot comply.

Respectfully submitted this 29th day of December, 1997

BELLSOUTH TELECOMMUNICATIONS, INC.

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ROBERT G. BEATTY

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