



ORIGINAL

1-888-477-1224 • Fax: (540) 265-6754
P.O. Box 6129, Roanoke, VA 24017-0129

Sent VIA Facsimile and Airborne

December 2, 2002

Florida Public Service Commission
Attention: Blanca Bio
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Response to Docket 020646-TX
Order No. PSC-02-1656-PAA-TX
Issued November 26, 2002

Dear Staff:

In response to your order identified above that was issued and faxed to Cat Communications (CCI) on November 26th, CCI requests that a portion of the order be revised.

As ordered, we have submitted said letter to our active customers in Florida, totaling 3014. This letter was mailed out on November 13th and customers have been given until December 15th to respond. There is no way that we can have the freezes removed by December 15th, since this is the last date to respond, as stated on Page 6 of this order. We can begin the process shortly thereafter waiting for any mailing time lag that there may be for the customer to return the request to keep the freeze.

CCI therefore is requesting from the Commission an additional 30 days to process orders of those customer requesting the freeze to be removed. This should give us ample time to process the orders, receive completion responses from the ILECs and finalize a report for you.

CCI respectfully requests, as stated in their remarks at the hearing, that the Commission seriously reconsider the "loose" wording that is used in Section 364.603 and Rule 25-4.110 (16). Quoting the staff, CCI has been in violation of their "interpretation" of these portions of the code. CCI again reiterates that they do not feel they were in violation of the code. The PC Freeze needs to be identified more clearly as a local **and** a long distance carrier choice. Also CCI **was** stating on **each and every** bill (not just initially

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC _____
OTH _____

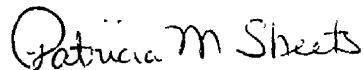
DOCUMENT NUMBER - DATE
13191 DEC-3 2002
FPSC-COMMISSION CLERK

and once a year thereafter) that a freeze was being utilized. The rule needs to be made more exact as to what the Commission feels as fair to the consumer. Otherwise it would appear that the Commission is "picking" on the larger providers and therefore discriminating against them by not making all providers follow strict unquestionable rules.

CCI also is questioning another monster that is beginning to rear its ugly head. What is the Commission requiring of facilities-based carriers as far as notification to the consumer of their inability to migrate or even disconnect service for a period of approximately 30 days from the date of request? This situation holds similarities to a PC freeze as held by the Commission. Hopefully these types of providers are being **required** to notify the consumer in advance and on their first bill and once annually thereafter that they may experience close to a one month wait to either move their service or get new service if a disconnection is first required. For a customer to possibly be in a suspended state without any phone service and have to wait this extended period to have the number ported back to the ILEC for migration or just have it disconnected, should be a proactive concern of the Commission.

We await your replies to our request and also our questions we have posed.

Sincerely,



Patricia M. Sheets
Vice President Regulatory

02 DEC -3 PM 2:57

DISTRIBUTION CENTER