

State of Florida



# Public Service Commission

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**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** March 8, 2012  
**TO:** Ann Cole, Commission Clerk, Office of Commission Clerk  
**FROM:** Kiwanis L. Curry, Regulatory Analyst III, Division of Regulatory Analysis  
**RE:** Docket 110303-OT

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Please add the attached responses to the survey questions regarding Rule 25-4.0161, F.A.C., Regulatory Assessment Fees. The responses were submitted on behalf of from Inmate Calling Solutions, LLC d/b/a ICSolutions (TG967).

DOCUMENT NUMBER-DATE  
01356 MAR-8 2012  
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**Kiwanis Curry**

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**From:** Ken Dawson [kdawson@icsolutions.com]  
**Sent:** Monday, February 27, 2012 5:41 PM  
**To:** Kiwanis Curry  
**Cc:** Judy Harlow  
**Subject:** Industry Survey - docket No. 110303-OT (RAF Rule)  
**Attachments:** FL Data Request - RAF Rule.pdf

Ms. Curry and/or Harlow,  
Please see responses for the above captioned matter embedded in the survey questionnaire, attached.

Regards,  
*Ken Dawson,*  
*Director Contracts & Regulatory*  
*210-581-8104*

DOCUMENT NUMBER-DATE

01356 MAR-8 2012

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**Rule 25-4.0161, F.A.C. – Survey Questions**

The following survey questions apply to **Rule 25-4.0161, F.A.C., Regulatory Assessment Fees; Telecommunications Companies**. For responding to these questions, please refer to Subsection 120.541(2), F.S., and Subparagraph 120.745(1)(b)2, F.S. “Transactional costs” are defined in Subparagraph 120.541(2)(d), F.S., as:

...direct costs that are readily ascertainable based upon standard business practices, including filing fees, the cost of obtaining a license, the cost of equipment required to be installed or used or procedures required to be employed in complying with the rule, additional operating costs incurred, the cost of monitoring and reporting, and any other costs necessary to comply with the rule.

The company’s response data to these survey questions should be provided for the entire rule, unless the response data is available by rule section, in which case we request the response data be provided by rule section. Please present data in annualized format, if possible, and all cost or benefit dollar estimates should be stated in nominal terms.

1. What are the estimated transactional costs resulting from the Company’s compliance of Rule 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

**At current operating levels, the Company estimates compliance with the subject rule to be approximately \$200 per year or \$1,000 for the stated 5-year period. In the event the Company’s revenue rises to a level where semi-annual reporting is needed, the estimated costs would double.**

- a. What are your actual transactional costs resulting from your Company’s compliance with Rule 25-4.0161, F.A.C., for the period July 1, 2011 through December 31, 2011? \$200

2. What is your estimate of the likely impact, stated in terms of costs and/or benefits, on small businesses (as defined by Section 288.703, F.S.) located in the Company’s service territory, resulting from the compliance of Rule 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

**No material impact estimated.**

3. What is your estimate of the likely impact, stated in terms of costs and/or benefits, on small counties and small cities (as defined in Section 120.52, F.S.) located in the Company’s service territory, resulting from the compliance of 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

**No material impact estimated.**

4. What is your estimate of the likely impact, stated in terms of costs and/or benefits, on entities located in the Company’s service territory other than those specifically identified in Questions 2 and 3, resulting from the compliance of 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

**No material impact estimated.**

DOCUMENT NUMBER-DATE  
**01356 MAR-8 09**  
FPSC-COMMISSION CLERK

5. What expected impact do you believe Rule 25-4.0161, F.A.C., will have on economic growth, private sector job creation or employment, and private sector investment for the five year period July 1, 2011 in the Company's service territory?

No material impact estimated.

6. What expected impact do you believe Rule 25-4.0161, F.A.C., will have on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets, productivity, and innovation, for the five year period July 1, 2011?

No material impact estimated.

7. What are the benefits to your Company associated with Rule 25-4.0161, F.A.C.?

The elimination of the redundant IXC Assessment Fee reporting has resulted in a nominal reduction to the Company's costs.

8. Since the December 4, 2011 rule change has your Company revised customer rates in order to comply with Rule 25-4.0161, F.A.C.? No. If so, please explain any rate changes that were made.

9. If the Company did revise customer rates after the rule change, what were the specific costs associated with processing and implementing these rate changes? n/a

10. Does the Company anticipate having to revise customer rates in the future in order to comply with Rule 25-4.0161, F.A.C.? No. If so, please explain any anticipated rate changes for the five year period beginning July 1, 2011.

11. If the company anticipates revising customer rates in order to comply with Rule 25-4.0161, F.A.C., what costs does the company expect to incur to process and implement the rate changes for the five year period beginning July 1, 2011? n/a