

Eric Fryson

From: Debi Nobles [dnobles@townes.net]
Sent: Wednesday, March 14, 2012 3:13 PM
To: Filings@psc.state.fl.us
Subject: Docket No 110303-OT - Survey Question Responses Provided by NEFCOM

Attachments: NEFCOM Response to Staff's Survey Questions Docket No 110303-OT.PDF



NEFCOM

Response to Staff's :

Deborah Nobles
Vice President of Regulatory Affairs
Townes Telecommunications Services Corporation
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Docket No. 110303-OT

Filed on behalf of: NEFCOM

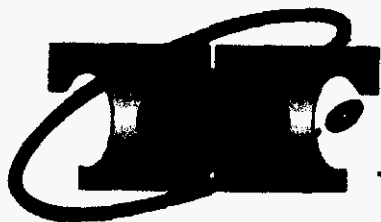
Number of pages: 4

Attachments: Responses to survey questions regarding Rule 25-4.0161,
F.A.C. and Rule 25-22.032, F.A.C.

DOCUMENT NUMBER DATE

01510 MAR 14 2012

FPSC-COMMISSION CLERK



TOWNES TELECOMMUNICATIONS SERVICES CORPORATION

Via E-mail to filings@psc.state.fl.us

March 14, 2012

Judy Harlow
c/o Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No. 110303-OT
Rule 25-4.0161, F.A.C.
Rule 25-22.032, F.A.C.

Dear Ms Harlow:

Enclosed are the responses to the survey questions regarding Rule 25-4.0161, F.A.C., Regulatory Assessment Fees; Telecommunications Companies submitted on behalf of NEFCOM.

In addition, NEFCOM does provide Lifeline Service and is subject to Rule 25-22.032, F.A.C., Consumer Complaints, but only as it relates to its provision of Lifeline Service. To my knowledge, NEFCOM has never received a consumer complaint related to Lifeline Services; therefore, the company has no meaningful information to provide in response to the survey questions.

If you have any questions, I can be reached at (904) 688-0029 or via email at dnobles@townes.net.

Sincerely,
s/Deborah Nobles

Deborah Nobles
Vice President of Regulatory Affairs

Enclosure

DOCUMENT NUMBER-DATE

505 Plaza Circle, Suite 200 . Orange Park, FL 32073 . (904) 688-0017 . (904) 688-0049 Fax

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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?

Response: NEFCOM estimates the annual cost of complying with Rule 25-4.0161 to be \$800. The cost to comply with the Rule for the five year period would be approximately \$4,000.

- 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?

Response: \$814.06

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?

Response: NEFCOM cannot identify any specific benefits small businesses have realized or will continue to realize by Rule 25-4.0161 being in existence. Competition among telecommunications providers and services is already flourishing in the state and small businesses in Florida have certainly been one of the recipients of the benefits of competition. The Public Service Commission retains authority over wholesale relationships between carriers, which may continue to provide some indirect benefit to small businesses.

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?

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Response: NEFCOM has not been able to identify any specific benefits the counties or small cities within its service territory have realized or will continue to realize by Rule 25-4.0161 being existence. The response is similar to that provided in question 2 above.

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?

Response: Same response as question 2 above.

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?

Response: NEFCOM has not evaluated the impact, if any, Rule 25-4.0161 may have on economic growth, private sector job creation or employment, and private sector invest.

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?

Response: NEFCOM has not evaluated the impact, if any, Rule 25-4.0161 could have on business competitiveness.

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

Response: The Public Service Commission will continue to handle disputes between carriers, however, even that particular benefit may diminish.

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.? If so, please explain any rate changes that were made.

Response: No, NEFCOM has not revised customer rates to comply with Rule 25-4.0161.

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?

Response: Not applicable.

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.? If so, please explain any anticipated rate changes for the five year period beginning July 1, 2011.

Response: NEFCOM does not anticipate having to increase customer rates due to the cost of complying with Rule 25-4.0161.

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?

Response: Not applicable.