

**ORIGINAL  
FILE COPY**

1 TESTIMONY OF S. E. SANDERS

2 DOCKET NO. 870790-TL

3 EXTENDED AREA SERVICE

4 GILCHRIST COUNTY

5 APRIL 22, 1991

6

7 Q. PLEASE STATE YOUR NAME AND ADDRESS.

8

9 A. MY NAME IS SANDY E. SANDERS AND MY BUSINESS ADDRESS  
10 IS 675 W. PEACHTREE STREET, N.E., ATLANTA, GEORGIA.

11

12 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

13

14 A. I AM EMPLOYED BY SOUTHERN BELL TELEPHONE AND  
15 TELEGRAPH COMPANY AS A STAFF MANAGER - RATES. IN  
16 THIS CAPACITY, MY RESPONSIBILITIES INCLUDE HANDLING  
17 RATE AND TARIFF MATTERS FOR FLORIDA, AND  
18 SPECIFICALLY ANALYSIS OF TARIFF FILINGS FOR  
19 EXTENDED AREA SERVICE (EAS) OFFERED BY SOUTHERN  
20 BELL IN FLORIDA.

21

22 Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND  
23 COMPANY EXPERIENCE.

24

25 A. I GRADUATED FROM CAMPBELL UNIVERSITY IN 1969 WITH A

DOCUMENT NUMBER 0177

03380 APR 22 1991

1 BACHELOR OF ARTS DEGREE IN SOCIAL SCIENCE. I  
2 IMMEDIATELY JOINED SOUTHERN BELL IN THE OPERATOR  
3 SERVICES ORGANIZATION IN NORTH CAROLINA. FOLLOWING  
4 A MILITARY LEAVE OF TWO YEARS I ACCEPTED AN  
5 ASSIGNMENT IN THE TRAFFIC FACILITIES ORGANIZATION  
6 IN CHARLOTTE, NORTH CAROLINA. SUBSEQUENTLY, I  
7 JOINED THE CORPORATE PLANNING DEPARTMENT IN ATLANTA  
8 WITH RESPONSIBILITIES FOR ADMINISTERING USAGE  
9 STUDIES AND DEVELOPING LOCAL EXCHANGE RATES  
10 THROUGHOUT SOUTHERN BELL INCLUDING THE PREPARATION  
11 OF TARIFF FILINGS. I ASSUMED MY PRESENT DUTIES IN  
12 JANUARY, 1981.

13

14 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS  
15 COMMISSION?

16

17 A. YES. I HAVE TESTIFIED ON BEHALF OF SOUTHERN BELL  
18 IN SEVEN EAS DOCKETS.

19

20 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

21

22 A. MY TESTIMONY PRESENTS THE TRAFFIC STUDIES WHICH  
23 SOUTHERN BELL USED IN DOCKET NO. 870790-TL  
24 DETAILING LONG DISTANCE TELEPHONE USAGE DATA AND  
25 OTHER RELEVANT DATA FOR CUSTOMERS AND TELEPHONE

1 SERVICE ARRANGEMENTS IN THE SOUTHERN BELL EXCHANGES  
2 IN GILCHRIST COUNTY. BECAUSE THREE OF THE LONG  
3 DISTANCE STUDY ROUTES ARE INTERLATA, SOUTHERN  
4 BELL'S TRAFFIC STUDIES ON THESE ROUTES ARE BASED ON  
5 AT&T USAGE DATA. AS SUCH, THE STUDIES WILL BE  
6 FILED PURSUANT TO A REQUEST FOR CONFIDENTIAL  
7 CLASSIFICATION AS SET FORTH IN RULE 25-22.006,  
8 FLORIDA ADMINISTRATIVE CODE. TO THE EXTENT THAT  
9 THE EXHIBITS TO MY TESTIMONY CONTAIN AT&T DATA,  
10 THOSE EXHIBITS HAVE BEEN FILED PURSUANT TO A  
11 REQUEST FOR CONFIDENTIAL CLASSIFICATION AS SET  
12 FORTH IN RULE 25-22.006, FLORIDA ADMINISTRATIVE  
13 CODE. MY TESTIMONY ALSO ADDRESSES SOUTHERN BELL'S  
14 POSITION REGARDING EAS AND OPTIONAL EAS PLANS FOR  
15 SOUTHERN BELL CUSTOMERS IN GILCHRIST COUNTY.

16

17 Q. PLEASE DESCRIBE THE TRAFFIC STUDDIES CONDUCTED BY  
18 SOUTHERN BELL IN THIS DOCKET.

19

20 A. PURSUANT TO FPSC ORDER NO. 17943, SOUTHERN BELL  
21 CONDUCTED A TRAFFIC STUDY IN GILCHRIST COUNTY IN  
22 SEPTEMBER 1987. SUBSEQUENTLY, IN RESPONSE TO  
23 COMMISSION ORDER NO. 20607, SOUTHERN BELL CONDUCTED  
24 A JANUARY 1989 POCKET TRAFFIC STUDY TO DETERMINE  
25 COMMUNITY OF INTEREST FACTORS BETWEEN A SMALL

1 PORTION OF NEWBERRY LOCATED IN GILCHRIST COUNTY AND  
2 TRENTON, THE COUNTY SEAT. TRAFFIC STUDIES WERE  
3 CONDUCTED AGAIN IN FEBRUARY 1991 TO OBTAIN CURRENT  
4 CUSTOMER CALLING STATISTICS. MY TESTIMONY IS BASED  
5 UPON THE RESULTS OF THE MOST RECENT TRAFFIC  
6 STUDY.

7  
8 THIS STUDY INDICATES THAT NO ROUTES BETWEEN  
9 EXCHANGES MEET THE COMMISSION CRITERIA FOR  
10 CONSIDERATION OF EAS. THE TRAFFIC STUDIES SHOW  
11 THAT CALLING FROM A SMALL POCKET OF NEWBERRY  
12 CUSTOMERS LOCATED IN GILCHRIST COUNTY TO THE  
13 TRENTON EXCHANGE COULD MEET THE CRITERIA IF THE  
14 COMMISSION RULES CONTEMPLATED POCKET CALLING.  
15 HOWEVER, THE COMMISSION RULES SPECIFICALLY ADDRESS  
16 CALLING CRITERIA ON THE BASIS OF EXCHANGE TO  
17 EXCHANGE CALLING.

18

19 Q. PLEASE DESCRIBE SOUTHERN BELL'S TELEPHONE SERVICE  
20 OPERATIONS IN GILCHRIST COUNTY.

21

22 A. SOUTHERN BELL IS CERTIFICATED TO SERVE THE NEWBERRY  
23 AND TRENTON TELEPHONE EXCHANGES IN GILCHRIST  
24 COUNTY. EXHIBIT 1 OF MY TESTIMONY PRESENTS A MAP  
25 WHICH SHOWS THE RELATIVE SIZE AND RELATIONSHIP OF

1 THE TELEPHONE EXCHANGES IN GILCHRIST COUNTY AS WELL  
2 AS EXISTING EAS ROUTES IN THE COUNTY. PAGE 2 OF  
3 EXHIBIT 1 SHOWS THE DISTANCE BETWEEN EXCHANGES, THE  
4 MONTHLY CALLING RATE PER LINE FOR EACH STUDY ROUTE  
5 AND THE ASSOCIATED PERCENTAGE OF CUSTOMERS PLACING  
6 TWO OR MORE CALLS PER MONTH ON EACH STUDY ROUTE.

7

8 Q. IS THERE A SUFFICIENT COMMUNITY OF INTEREST ON THE  
9 TOLL ROUTES IN GILCHRIST COUNTY TO JUSTIFY  
10 IMPLEMENTING EXTENDED AREA SERVICE AS CURRENTLY  
11 DEFINED IN THE COMMISSION RULES?

12

13 A. NO. BEFORE DISCUSSING THE COMMUNITY OF INTEREST  
14 BETWEEN THE EXCHANGES IN GILCHRIST COUNTY, I WOULD  
15 LIKE TO POINT OUT THAT THE STUDY REFLECTS CALLS  
16 PLACED VIA 1+ DIALING ON THE STUDY ROUTES. THIS  
17 MEANS THAT TOLL CALLS AS WELL AS CALLS PLACED BY  
18 CUSTOMERS SUBSCRIBING TO SOUTHERN BELL'S ENHANCED  
19 OPTIONAL EXTENDED AREA SERVICE (EOEAS) ARE INCLUDED  
20 IN THE STUDY SINCE BOTH TYPES OF CALLS ARE PLACED  
21 VIA 1+ DIALING ON THE NEWBERRY/TRENTON ROUTES. THE  
22 MOST CURRENT TRAFFIC STUDY REFLECTS CALLING  
23 PATTERNS BETWEEN NEWBERRY AND TRENTON CUSTOMERS AT  
24 SIGNIFICANTLY HIGHER LEVELS THAN SOUTHERN BELL'S  
25 TWO PREVIOUS TRAFFIC STUDIES. THIS IS DUE TO

1 CALLING RATES FOR CUSTOMERS SUBSCRIBING TO EITHER  
2 THE PREMIUM FLAT RATE OR DISCOUNT OPTIONS AVAILABLE  
3 UNDER THE EOEAS PLAN WHICH ARE HIGHER THAN THOSE  
4 CALLING RATES FOR OTHER CUSTOMERS PLACING TOLL  
5 CALLS BETWEEN THESE TWO EXCHANGES. EOEAS WAS  
6 IMPLEMENTED ON THE NEWBERRY TO TRENTON AND TRENTON  
7 TO NEWBERRY/GAINESVILLE ROUTES ON JUNE 20, 1990.

8  
9 THE RESULTS OF SOUTHERN BELL'S TRAFFIC STUDY  
10 INDICATE THAT A COMMUNITY OF INTEREST, AS DEFINED  
11 IN THE COMMISSION RULES, DOES NOT EXIST ON ANY  
12 ROUTE IN GILCHRIST COUNTY. COMMISSION RULE  
13 25-4.060(2)(a) STATES THAT A COMMUNITY OF INTEREST,  
14 SUFFICIENT TO WARRANT FURTHER PROCEEDINGS, WILL BE  
15 CONSIDERED TO EXIST WHEN "STUDIES OF ONE-WAY  
16 TRAFFIC ORIGINATING IN THE SMALLER EXCHANGE ...  
17 [SHOW] ... A CALLING RATE ... [OF] ... THREE OR  
18 MORE M/M/M WITH AT LEAST FIFTY PERCENT OF THE  
19 EXCHANGE SUBSCRIBERS MAKING TWO OR MORE CALLS PER  
20 MONTH".

21  
22 Q. PLEASE EXPLAIN THE RESULTS OF THE TRAFFIC STUDY  
23 CONDUCTED DURING FEBRUARY 1991.

24  
25 A. THE RESULTS OF THE STUDY ARE CONTAINED IN EXHIBITS

1 3 AND 4. EXHIBIT 2 MERELY DEPICTS THE DISTANCE  
2 BETWEEN RATE CENTERS AND THE AVERAGE REVENUE PER  
3 CALL FOR EACH ROUTE. THE FIRST PAGE OF EXHIBIT 3  
4 REFLECTS A SUMMARY OF MONTHLY CALLING RATES. FOR  
5 PURPOSES OF ILLUSTRATION, THROUGHOUT MY TESTIMONY I  
6 WILL USE CALLING PATTERNS ON THE NEWBERRY/TRENTON  
7 ROUTE. SOUTHERN BELL'S TRAFFIC STUDY SHOWS THAT  
8 THE CALLING RATE FROM THE NEWBERRY EXCHANGE TO THE  
9 TRENTON EXCHANGE MEETS THE COMMUNITY OF INTEREST  
10 CRITERION OF THREE CALLS PER LINE PER MONTH SET  
11 FORTH IN THE COMMISSION RULES. NOT A SINGLE  
12 EXCHANGE ROUTE MEETS THE COMMISSION RULE WHICH  
13 REQUIRES THAT AT LEAST 50% OF THE CUSTOMERS PLACE  
14 TWO OR MORE CALLS PER MONTH TO THE REQUESTED  
15 EXCHANGE(S) FOR FURTHER CONSIDERATION OF EAS.  
16 THUS, THESE STUDIES INDICATE THAT NONE OF THE STUDY  
17 EXCHANGE ROUTES MEETS THE COMMISSION CRITERIA FOR  
18 CONSIDERATION OF EAS.

19

20 THE TRAFFIC STUDY SHOWS THAT CALLING FROM THE  
21 POCKET OF NEWBERRY CUSTOMERS LOCATED IN GILCHRIST  
22 COUNTY TO THE TRENTON EXCHANGE WOULD MEET THE  
23 COMMISSION CRITERIA IF THIS WERE AN EXCHANGE ROUTE.  
24 IN ADDITION, THERE IS A ROUTE FROM THE NEWBERRY  
25 POCKET TO A TRENTON POCKET OF CUSTOMERS IN

1 GILCHRIST COUNTY THAT WOULD MEET THESE CRITERIA.  
2 HOWEVER, THE COMMISSION RULES SPECIFICALLY ADDRESS  
3 CALLING CRITERIA ON THE BASIS OF EXCHANGE TO  
4 EXCHANGE CALLING.  
5  
6 PAGE 1 OF EXHIBIT 3 REFLECTS A MONTHLY CALLING RATE  
7 OF 3.94 CALLS PER LINE FROM NEWBERRY TO TRENTON.  
8 IN THE REVERSE DIRECTION, THE MONTHLY CALL RATE  
9 FROM TRENTON TO NEWBERRY IS 2.62 CALLS PER LINE.  
10 PAGE 2 OF EXHIBIT 3 SHOWS 11.76 MONTHLY CALLS PER  
11 LINE FROM THE SMALL PORTION OF NEWBERRY LOCATED IN  
12 GILCHRIST COUNTY TO THE TRENTON EXCHANGE.  
13 HOWEVER, BECAUSE THE COMMISSION RULES ADDRESS CALLS  
14 BETWEEN EXCHANGES, THE POCKET STUDY RESULTS SHOULD  
15 NOT BE MEASURED AGAINST THE NON-POCKET CRITERIA.  
16  
17 PAGE 2 OF EXHIBIT 3 REFLECTS ONE WAY CALLING  
18 STATISTICS ON THESE ROUTES WHILE PAGE 3 SHOWS  
19 SIMILAR INFORMATION ON A TWO-WAY CALLING BASIS.  
20 PAGE 2 ALSO SHOWS THAT THE PERCENTAGE OF NEWBERRY  
21 CUSTOMERS PLACING TWO OR MORE CALLS PER MONTH TO  
22 THE TRENTON EXCHANGE IS ONLY 25%, AND THAT FEWER  
23 THAN 27% OF THE TRENTON CUSTOMERS PLACE TWO OR MORE  
24 CALLS PER MONTH TO NEWBERRY. THIS IS FAR BELOW THE  
25 CRITERION OF 50% ESTABLISHED IN THE COMMISSION



1 RULES.

2

3 EXHIBIT 4 PRESENTS A MORE DETAILED BREAKDOWN OF  
4 CALLING AMONG CUSTOMER ACCOUNTS. THE DATA ON  
5 EXHIBIT 4 SHOW THAT SOME CUSTOMERS MAKE  
6 SUBSTANTIALLY MORE CALLS THAN OTHERS AND MANY MAKE  
7 NO CALLS. FOR EXAMPLE, PAGE 1 OF EXHIBIT 4 SHOWS  
8 THAT OVER 66 PERCENT OF ALL NEWBERRY CUSTOMERS DID  
9 NOT MAKE ANY CALLS TO TRENTON IN THE STUDY MONTH.  
10 LIKewise, OVER 63 PERCENT OF ALL TRENTON CUSTOMERS  
11 DID NOT PLACE A SINGLE CALL TO NEWBERRY IN THE  
12 STUDY MONTH AS SHOWN ON PAGE 2 OF EXHIBIT 4.

13

14 Q. WHAT FACTORS SHOULD BE CONSIDERED WHEN DETERMINING  
15 WHETHER A COMMUNITY OF INTEREST EXISTS IN GILCHRIST  
16 COUNTY?

17

18 A. THERE ARE SEVERAL FACTORS THAT SHOULD BE CONSIDERED  
19 IN DETERMINING COMMUNITY OF INTEREST BETWEEN  
20 EXCHANGES. THE CALL RATE BETWEEN EXCHANGES IS THE  
21 FOREMOST INDICATOR AS TO THE DEGREE OF COMMUNITY OF  
22 INTEREST BETWEEN TWO EXCHANGES. ADDITIONAL  
23 EVIDENCE AS TO THE DEGREE OF COMMUNITY OF INTEREST  
24 IS THE CALL DISTRIBUTION OBTAINED FROM THE TRAFFIC  
25 STUDIES. THE MOST RECENT STUDY SHOWS, AS I NOTED

1 PREVIOUSLY, THAT WHILE THE AVERAGE CALL RATE FROM  
2 NEWBERRY TO TRENTON IS 3.94 CALLS PER LINE PER  
3 MONTH, OVER 66 PERCENT OF THE NEWBERRY CUSTOMERS  
4 DID NOT PLACE A SINGLE CALL TO TRENTON DURING THE  
5 STUDY MONTH. SOME CUSTOMERS WITH EXTREMELY HIGH  
6 CALLING RATES CAN CAUSE A DISTORTED VIEW OF THE  
7 ACTUAL COMMUNITY OF INTEREST WHEN CALL RATE IS THE  
8 ONLY INDICATOR EXAMINED. AS FURTHER ILLUSTRATION  
9 OF THIS, PAGE 1 OF EXHIBIT 4 SHOWS THAT FEWER THAN  
10 FIVE PERCENT OF THE NEWBERRY CUSTOMERS MAKE ALMOST  
11 67 PERCENT OF ALL THE CALLS TO TRENTON. THIS MEANS  
12 THAT 135 CUSTOMERS OUT OF A CUSTOMER BODY OF 2,796  
13 PLACE TWO-THIRDS OF THE CALLS TO TRENTON.  
14 SIMILARLY, FEWER THAN FOUR PERCENT OF OUR TRENTON  
15 CUSTOMERS PLACE OVER ONE-HALF OF THE CALLS TO  
16 NEWBERRY. OF COURSE, THE COMMISSION RULES REQUIRE  
17 A ONE-WAY CALLING RATE OF THREE CALLS PER LINE PER  
18 MONTH WITH 50 PERCENT OF THE CUSTOMERS MAKING TWO  
19 OR MORE CALLS PER MONTH TO THE DISTANT EXCHANGE, OR  
20 A TWO-WAY CALLING RATE OF TWO CALLS PER LINE PER  
21 MONTH BETWEEN THE EXCHANGES WITH 50 PERCENT OF THE  
22 CUSTOMERS PLACING ONE OR MORE CALLS PER MONTH  
23 BETWEEN THE EXCHANGES FOR FURTHER CONSIDERATION OF  
24 EAS.  
25

1 IN ADDITION TO CONSIDERATIONS PROVIDED FOR IN THE  
2 COMMISSION RULES, THERE ARE SOME INTANGIBLE FACTORS  
3 OFTEN MENTIONED BY CUSTOMERS DESIRING EAS WHICH  
4 COULD BE CONSIDERED FOR DETERMINING LEVELS OF  
5 COMMUNITY OF INTEREST. THE LOCATION OF SCHOOLS,  
6 FIRE/POLICE DEPARTMENTS, MEDICAL/EMERGENCY  
7 FACILITIES AND COUNTY OFFICES ARE FACTORS WHICH CAN  
8 STIMULATE PETITIONS FOR EAS, AND THUS SHOULD  
9 POSSIBLY BE CONSIDERED IN IDENTIFYING COMMUNITY OF  
10 INTEREST LEVELS.

11

12 Q. PLEASE DISCUSS YOUR ANALYSIS OF ROUTES WHICH  
13 QUALIFY FOR CONSIDERATION OF EAS UNDER THE EXISTING  
14 COMMISSION RULES.

15

16 A. SOUTHERN BELL'S TRAFFIC STUDY IDENTIFIES NO ROUTES  
17 IN GILCHRIST COUNTY THAT MEET THE COMMUNITY OF  
18 INTEREST FACTORS ESTABLISHED IN THE COMMISSION  
19 RULES FOR CONSIDERATION OF EAS. DETAILED POCKET  
20 TRAFFIC STUDIES REVEAL SIGNIFICANT CALLING LEVELS  
21 ONLY FROM THE NEWBERRY POCKET OF CUSTOMERS LOCATED  
22 IN GILCHRIST COUNTY TO THE TRENTON EXCHANGE AND  
23 FROM THE NEWBERRY POCKET TO THE TRENTON POCKET OF  
24 CUSTOMERS THAT IS LOCATED IN GILCHRIST COUNTY.

25

1 Q. WHAT EAS PLAN OR TOLL ALTERNATIVE PLAN, IF ANY,  
2 SHOULD BE IMPLEMENTED IN GILCHRIST COUNTY?  
3  
4 A. THE COMMISSION DETERMINED IN SOUTHERN BELL'S RATE  
5 STABILIZATION DOCKET, DOCKET NO. 880069-TL, THAT  
6 OPTIONAL EAS WAS IN THE PUBLIC INTEREST ON NUMEROUS  
7 SOUTHERN BELL ROUTES. COMMISSION ORDER NO. 20162  
8 IN THAT DOCKET DIRECTED SOUTHERN BELL TO IMPLEMENT  
9 AN ENHANCED OPTIONAL EXTENDED AREA SERVICE (EOEAS)  
10 PLAN. SOUTHERN BELL FAVORS OPTIONAL SERVICE  
11 ARRANGEMENTS SUCH AS EOEAS BECAUSE THEY OFFER ALL  
12 CUSTOMERS GREATER CHOICE IN SERVICE SELECTION  
13 DEPENDING ON THEIR PARTICULAR CALLING PATTERNS AND  
14 AMOUNT OF USAGE. OUR OBJECTIVE IS TO OFFER THE  
15 CUSTOMER AN OPTION OF HOW HE OR SHE IS TO SPEND HIS  
16 OR HER MONEY, NOT TO BURDEN THE CUSTOMER WITH THE  
17 COST OF EAS HE OR SHE DOESN'T USE. THIS IS  
18 CERTAINLY MORE EQUITABLE.  
19  
20 COMMISSION ORDER NO. 23200 DIRECTED SOUTHERN BELL  
21 TO IMPLEMENT ITS EOEAS PLAN FOR CUSTOMERS IN  
22 NEWBERRY AND IN TRENTON. ON JUNE 20, 1990,  
23 SOUTHERN BELL MADE THIS SERVICE AVAILABLE ON THE  
24 NEWBERRY TO TRENTON AND THE TRENTON TO NEWBERRY AND  
25 GAINESVILLE ROUTES. AS OF MARCH 31, 1991, 326

1 CUSTOMERS HAD SELECTED ONE OF THESE CALLING  
2 OPTIONS. EXHIBIT 5 REFLECTS THE RATES APPLICABLE  
3 FOR EACH EOEAS OPTION AND THE NUMBER OF CUSTOMERS  
4 SELECTING EACH OPTION. SOUTHERN BELL'S POSITION IS  
5 THAT THIS OPTIONAL PLAN MEETS THE NEEDS OF OUR  
6 CUSTOMERS IN NEWBERRY AND TRENTON. THIS PLAN  
7 PROVIDES OPTIONS FOR CUSTOMERS BASED ON THEIR  
8 INDIVIDUAL CALLING REQUIREMENTS AND DOES NOT  
9 PENALIZE THOSE CUSTOMERS WHO HAVE NO NEED OR DESIRE  
10 TO CALL TO THE EXPANDED CALLING AREA. THEY DO NOT  
11 PAY FOR A PLAN WHICH THEY DO NOT WANT.

12

13 UNDER INTRALATA CIRCUMSTANCES, SOUTHERN BELL WOULD  
14 RECOMMEND EOEAS ON THE NEWBERRY TO BRANFORD AND  
15 TRENTON TO BRANFORD AND HIGH SPRINGS ROUTES;  
16 HOWEVER, IT IS INAPPROPRIATE FOR SOUTHERN BELL TO  
17 PROPOSE THIS PLAN BECAUSE THESE ROUTES ARE  
18 INTERLATA.

19

20 Q. HAVE YOU INVESTIGATED ANY OTHER ALTERNATIVES FOR  
21 CONSIDERATION IN THIS DOCKET?

22

23 A. SOUTHERN BELL HAS DETERMINED THE FEASIBILITY, COST  
24 AND PROCEDURES FOR IMPLEMENTING TRADITIONAL TWO-WAY  
25 FLAT RATE NON-OPTIONAL EAS.

1  
2 RATE INCREASES HAVE BEEN DEVELOPED WHICH REFLECT  
3 THE RESULTANT MONTHLY EAS ADDITIVES REQUIRED TO  
4 COVER THE COSTS AND LOST TOLL AND ACCESS REVENUES  
5 ASSOCIATED WITH IMPLEMENTING TRADITIONAL, TWO-WAY,  
6 NON-OPTIONAL EAS THROUGHOUT GILCHRIST COUNTY.  
7 EXHIBIT 6 SHOWS THE APPLICABLE MONTHLY RATE  
8 ADDITIVES THAT WOULD APPLY TO NEWBERRY AND TRENTON  
9 CUSTOMERS IF COUNTYWIDE EAS WERE IMPLEMENTED  
10 WHEREBY THE COMMISSION ALLOWED SOUTHERN BELL TO  
11 RECOVER THE ADDITIONAL COSTS ASSOCIATED WITH  
12 IMPLEMENTING THIS PLAN. THESE EAS ADDITIVES  
13 MAINTAIN THE PRESENT RATE RELATIONSHIPS OF THE  
14 VARIOUS CLASSES OF SERVICE.  
15  
16 Q. SHOULD EAS BE IMPLEMENTED ON A COUNTYWIDE BASIS IN  
17 GILCHRIST COUNTY?  
18  
19 A. NO. SOUTHERN BELL MAINTAINS THAT ANY TWO-WAY,  
20 NON-OPTIONAL EAS PLAN SHOULD PERMIT THE FULL  
21 RECOVERY OF COSTS AND LOST TOLL AND ACCESS REVENUES  
22 ASSOCIATED WITH IMPLEMENTING THE PLAN. ALSO, I  
23 CONTEND THAT IT WOULD BE UNREASONABLE FOR OUR  
24 GILCHRIST COUNTY CUSTOMERS WHO DO NOT NEED, WANT OR  
25 DESIRE ADDITIONAL LOCAL CALLING TO SHARE IN THE

1 COST OF THE PLAN.

2

3 IT IS SOUTHERN BELL'S POSITION THAT NON-OPTIONAL  
4 EAS IS NOT IN THE BEST INTEREST OF OUR CUSTOMERS.  
5 NON-OPTIONAL EAS CREATES A SITUATION IN WHICH MANY  
6 CUSTOMERS PAY FOR A LOCAL CALLING CAPABILITY FAR IN  
7 EXCESS OF WHAT THEY USE. THEREFORE, ALTHOUGH  
8 EXPANDED, NON-OPTIONAL EAS DOES NOT NECESSARILY  
9 BENEFIT ALL CUSTOMERS EQUALLY, THEY ALL WOULD PAY  
10 EQUALLY FOR THE SERVICE. THIS MEANS THAT A FEW  
11 HEAVY LONG DISTANCE USERS REALIZE SIZABLE  
12 REDUCTIONS IN COSTS WITH THE ELIMINATION OF LONG  
13 DISTANCE CHARGES WHILE THE VAST MAJORITY OF  
14 CUSTOMERS REALIZE INCREASES IN THEIR COST OF LOCAL  
15 SERVICE WITHOUT ANY CORRESPONDING BENEFIT.  
16 OBVIOUSLY, THIS APPROACH OF SPREADING THE HEAVY  
17 USERS' BILLS OVER ALL RATEPAYERS IN THE EXCHANGE OR  
18 EXCHANGES INVOLVED HAS APPEAL FOR THE SMALL NUMBER  
19 BENEFITING AT THE EXPENSE OF THE MAJORITY.

20

21 Q. IF THE COMMISSION ORDERS NON-OPTIONAL EAS ON ANY OR  
22 ALL ROUTES IN GILCHRIST COUNTY, HOW SHOULD THE  
23 SUBSCRIBER SURVEY BE CONDUCTED?

24

25 A. SOUTHERN BELL CONCURS WITH COMMISSION RULE 25-4.063

1           REGARDING THE METHOD OF HANDLING CUSTOMER POLLS.  
2           SPECIFICALLY, WE CONCUR WITH THE PORTION OF THE  
3           RULE THAT STATES "FIFTY-ONE PERCENT (51%) OF ALL  
4           SUBSCRIBERS ... REQUIRED TO BE SURVEYED VOTE  
5           FAVORABLY" FOR THE REQUESTED NON-OPTIONAL EAS TO BE  
6           IMPLEMENTED. ALL CUSTOMERS WHO WOULD RECEIVE AN  
7           INCREASE IN THEIR MONTHLY RATE FOR LOCAL SERVICE  
8           SHOULD BE INCLUDED IN THE POLL. IF THE POLL  
9           INVOLVES COUNTYWIDE EAS, THE RESULTS OF THE BALLOT  
10          SHOULD REFLECT THOSE VOTING FAVORABLY IN THE  
11          AGGREGATE, NOT ON A ROUTE BY ROUTE BASIS. IF THE  
12          POLL IS CONDUCTED ON A ROUTE BY ROUTE BASIS, THE  
13          EAS ADDITIVES SHOULD BE COST COMPENSATORY FOR EACH  
14          SPECIFIC ROUTE.

15

16 Q.   MR. SANDERS, WOULD YOU PLEASE SUMMARIZE YOUR  
17       TESTIMONY?

18

19 A.   SOUTHERN BELL DOES NOT ADVOCATE ESTABLISHING  
20       TRADITIONAL, TWO-WAY, NON-OPTIONAL EAS ON ANY  
21       EXISTING TOLL ROUTE IN GILCHRIST COUNTY.

22

23       REQUIRING ALL CUSTOMERS IN THESE EXCHANGES TO SHARE  
24       THE ADDITIONAL COSTS ASSOCIATED WITH PROVIDING FLAT  
25       RATE, NON-OPTIONAL EAS WOULD BE UNREASONABLY



1 DISCRIMINATORY TOWARDS TELEPHONE CUSTOMERS IN THESE  
2 EXCHANGES WHO WOULD MAKE LITTLE OR NO USE OF THE  
3 EXPANDED CAPABILITY. MY TESTIMONY DEMONSTRATES THE  
4 LACK OF JUSTIFICATION FOR FLAT RATE, NON-OPTIONAL,  
5 COUNTYWIDE EAS IN GILCHRIST COUNTY. AS I STATED  
6 PREVIOUSLY, SOUTHERN BELL PREFERS OPTIONAL CALLING  
7 PLANS THAT OFFER CUSTOMERS GREATER CHOICE IN  
8 SERVICE SELECTION BECAUSE THEY ALLOW CUSTOMERS TO  
9 TAILOR THEIR TELEPHONE BILLS AND CALLING SCOPES  
10 BASED ON THEIR INDIVIDUAL CALLING HABITS, DESIRES  
11 AND NEEDS. OPTIONAL RATE STRUCTURES ARE ALIGNED  
12 WITH VARYING CUSTOMER CALLING CHARACTERISTICS, ARE  
13 UNDERSTANDABLE AND ARE EQUITABLE TO ALL CUSTOMERS.  
14 THE EXISTING EOEAS PLAN IN NEWBERRY AND TRENTON  
15 ACCOMPLISHES THESE OBJECTIVES.

16

17 HOWEVER, IF THE COMMISSION DECIDES THAT TWO-WAY,  
18 NON-OPTIONAL, FLAT RATE EAS IS IN THE BEST INTEREST  
19 OF CUSTOMERS ON THE NEWBERRY TO TRENTON ROUTE, OR  
20 ON ANY ROUTE IN GILCHRIST COUNTY, SOUTHERN BELL'S  
21 POSITION IS THAT COST COMPENSATORY EAS ADDITIVES  
22 SHOULD APPLY TO THE CUSTOMERS BENEFITING FROM THE  
23 EXPANDED CALLING CAPABILITY AND THAT CUSTOMERS IN  
24 THE AFFECTED EXCHANGE(S) SHOULD BE POLLED ON THE  
25 INCREASE IN RATES.

1

2 Q. DOES THAT CONCLUDE YOUR TESTIMONY?

3

4 A. YES.

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

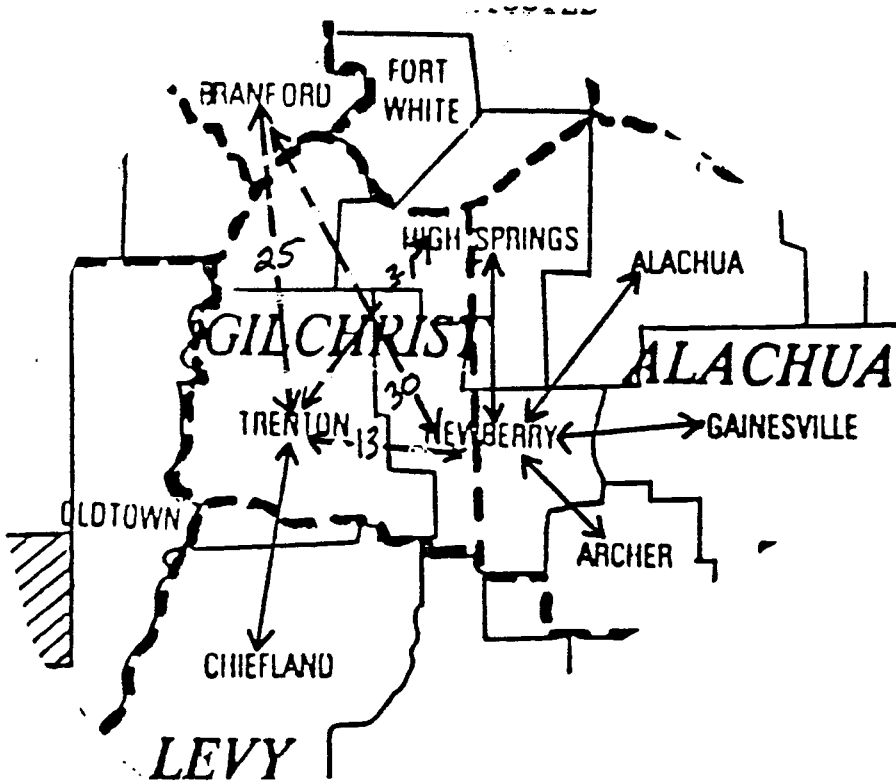
22

23

24

25

MAP OF  
GILCHRIST COUNTY  
INDICATING EXISTING TELEPHONE EXCHANGES  
AND EAS STUDY ROUTES



Legend

- ←————→ Existing EAS  
← - - - - - → Proposed EAS

SEE PAGE 2 FOR CALLING INFORMATION

GILCHRIST COUNTY  
 CALLING INFORMATION FOR EAS STUDY ROUTES

<u>FROM</u>	<u>TO</u>	<u>MILEAGE</u>	<u>M/M/M*</u>	<u>% MAKING 2 OR MORE CALLS PER MONTH*</u>
NEWBERRY	TRENTON	13	3.94	25.21
TRENTON	NEWBERRY	13	2.62	26.56
NEWBERRY (pocket)	TRENTON	13	11.76	54.40
TRENTON	NEWBERRY (pocket)	13	1.87	17.71
NEWBERRY	TRENTON (pocket)	13	3.53	22.34
TRENTON (pocket)	NEWBERRY	13	3.12	29.02
NEWBERRY (pocket)	TRENTON (pocket)	13	9.72	50.82
TRENTON (pocket)	NEWBERRY (pocket)	13	2.02	20.05
1 TRENTON	HIGH SPRINGS	21		
2 TRENTON	BRANFORD	25		
3 NEWBERRY (pocket)	BRANFORD	30		

\* Includes EOEAS Calling on Newberry/Trenton routes

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY  
 FLORIDA  
 LONG DISTANCE TOLL INFORMATION FOR  
 GILCHRIST COUNTY

	RATE (DAY PERIOD)		AIRLINE MILES *	REV PER MSG \$
	<u>INITIAL MINUTE</u> \$	<u>OVERTIME MINUTE</u> \$		

FROM: NEWBERRY TO: TRENTON	.18	.12	13	.24 <sup>1</sup>
FROM: TRENTON TO: NEWBERRY	.18	.12	13	.39 <sup>1</sup>
FROM: NEWBERRY(pocket) TO: TRENTON	.18	.12	13	.25 <sup>1</sup>
FROM: TRENTON TO: NEWBERRY(pocket)	.18	.12	13	.38 <sup>1</sup>
FROM: NEWBERRY TO: TRENTON(pocket)	.18	.12	13	.25 <sup>1</sup>
FROM: TRENTON(pocket) TO: NEWBERRY	.18	.12	13	.39 <sup>1</sup>
FROM: NEWBERRY(pocket) TO: TRENTON(pocket)	.18	.12	13	.25 <sup>1</sup>
FROM: TRENTON(pocket) TO: NEWBERRY(pocket)	.18	.12	13	.38 <sup>1</sup>
1 FROM: TRENTON TO: HIGH SPRINGS	.265	.16	21	
2 FROM: TRENTON TO: BRANFORD	.265	.22	25	
3 FROM: NEWBERRY(pocket) TO: BRANFORD	.265	.22	30	

\*RATE CENTER TO RATE CENTER

Note 1: ADJUSTED TO REFLECT EOEAS MESSAGES (FLAT RATE & DISCOUNTED CALLING)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY  
 FLORIDA  
 MONTHLY MESSAGES AND CALLING RATE PER ACCESS LINE  
 EAS - GILCHRIST COUNTY

STUDY ROUTE	MONTHLY MESSAGES			CALLING RATE PER ACCESS LINE PER MONTH			
	RESIDENCE	BUSINESS	COMBINED	RESIDENCE	BUSINESS ONE - WAY	COMBINED	COMBINED 2-WAY
NEWBERRY TO TRENTON <sup>1</sup>	10210	939	11149	4.01	3.29	3.94	3.31
TRENTON TO NEWBERRY <sup>1</sup>	5057	1622	6679	2.41	3.56	2.62	3.31
NEWBERRY(pocket) TO TRENTON	8355	204	8559	12.14	5.10	11.76	4.06
TRENTON TO NEWBERRY(pocket)	3661	1113	4774	1.74	2.45	1.87	4.06
NEWBERRY TO TRENTON(pocket)	9231	779	10010	3.62	2.73	3.53	3.36
TRENTON(pocket) TO NEWBERRY	4853	1196	6049	2.94	4.11	3.12	3.36
NEWBERRY(pocket) TO TRENTON(pocket)	6897	177	7074	10.02	4.43	9.72	4.12
TRENTON(pocket) TO NEWBERRY(pocket)	3197	727	3924	1.94	2.50	2.02	4.12
1 TRENTON TO HIGH SPRINGS							N/A
2 TRENTON TO BRANFORD							N/A
3 NEWBERRY(pocket) TO BRANFORD							N/A

\*\* Combined 2-way calling rate can not be determined from Southern Bell data for routes involving an Independent Company exchange.

Source: Call Distribution study (2-2-91 THRU 3-3-91)  
 (2-11-91 THRU 3-13-91)<sup>1</sup>

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY  
 FLORIDA  
 INTER-EXCHANGE TRAFFIC DATA  
 EAS - GILCHRIST COUNTY - SCHEDULE I  
ONE - WAY

<u>ROUTE</u>	<u>AL &amp; T</u>	<u>MESSAGES</u>	<u>CALLING RATE M/M/M</u>	<u>TOTAL CUSTOMERS</u>	<u>CUSTOMERS MAKING 2 OR MORE CALLS/MONTH</u>	
					<u>NUMBER</u>	<u>PERCENT</u>
PART I - ROUTES OVER 3 M/M/M						
NEWBERRY(pocket) TO TRENTON	728	8559	11.76	728	396	54.40
NEWBERRY TO TRENTON (pocket) (pocket)	728	7074	9.72	728	370	50.82
TRENTON TO NEWBERRY (pocket) (pocket)	1940	3924	2.02	1940	389	20.05
NEWBERRY TO TRENTON <sup>1</sup>	2833	11149	3.94	2796	705	25.21
NEWBERRY TO TRENTON(pocket)	2833	10010	3.53	2932	655	22.34
TRENTON(pocket) TO NEWBERRY	1940	6049	3.12	1940	563	29.02
PART II - ROUTES 2.99 TO 2.00 M/M/M						
TRENTON TO NEWBERRY <sup>1</sup>	2554	6679	2.62	2466	655	26.56
PART III - ROUTES 1.99 TO 1.00 M/M/M						
TRENTON TO NEWBERRY(pocket)	2554	4774	1.87	2614	463	17.71
PART IV - ROUTES BELOW .99 M/M/M						
TRENTON TO BRANFORD	2554			2614		
TRENTON TO HIGH SPRINGS	2554			2614		
NEWBERRY(pocket) TO BRANFORD	728			728		

Source Call Distribution Study (2-2-91 THRU 3-3-91)  
 (2-11-91 THRU 3-13-91)<sup>1</sup>

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY  
 FLORIDA  
 INTER-EXCHANGE TRAFFIC DATA  
 EAS - GILCHRIST COUNTY - SCHEDULE II  
TWO - WAY

<u>ROUTE</u>	<u>AL &amp; T</u>	<u>MESSAGES</u>	<u>CALLING</u>	<u>TOTAL</u>	<u>CUSTOMERS MAKING 1 OR MORE CALL/MONTH</u>	
			<u>RATE</u>	<u>CUSTOMERS</u>	<u>NUMBER</u>	<u>PERCENT</u>
			<u>M/M/M</u>			
PART I - ROUTES OVER 3 M/M/M						
NEWBERRY(pocket) TO/FROM TRENTON(pocket)	2668	10998	4.12	2668	451	16.90
NEWBERRY(pocket) TO/FROM TRENTON	3282	13333	4.06	3342	1149	34.38
NEWBERRY TO/FROM TRENTON(pocket)	4773	16059	3.36	4872	1664	34.15
NEWBERRY TO/FROM TRENTON <sup>1</sup>	5387	17828	3.31	5262	1834	34.85

PART II - ROUTES 2.99 TO 2.00 M/M/M

PART III - ROUTES 1.99 TO 1.00 M/M/M

PART IV - ROUTES BELOW .99 M/M/M

Source Call Distribution Study (2-2-91 THRU 3-3-91)  
 (2-11-91 THRU 3-13-91)<sup>1</sup>



Long Distance Calling for Southern Bell Exchanges, As Follows:

Study Period 02/11/91 through 03/13/91

Route: NEWBERRY TO TRENTON

NUMBER OF ACCOUNTS MAKING CALLS AT THESE LEVELS

NUMBER OF MESSAGES PLACED BY THESE LEVELS

MESSAGE LEVEL PER ACCOUNT	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCUM. PERCENT OF TOTAL	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCUM. PERCENT OF TOTAL
26 +	106	9	115	4.11%	4.11%	6641	340	6981	62.62%	62.62%
25	5	0	5	0.18%	4.29%	125	0	125	1.12%	63.74%
24	6	2	8	0.29%	4.58%	144	48	192	1.72%	65.46%
23	2	0	2	0.07%	4.65%	46	0	46	0.41%	65.87%
22	5	0	5	0.18%	4.83%	110	0	110	0.99%	66.86%
21	2	4	6	0.21%	5.04%	42	84	126	1.13%	67.99%
20	4	1	5	0.18%	5.22%	80	20	100	0.90%	68.89%
19	2	1	3	0.11%	5.33%	38	19	57	0.51%	69.40%
18	7	2	9	0.32%	5.65%	126	36	162	1.45%	70.85%
17	4	0	4	0.14%	5.79%	68	0	68	0.61%	71.46%
16	8	0	8	0.29%	6.08%	128	0	128	1.15%	72.61%
15	11	0	11	0.39%	6.47%	165	0	165	1.48%	74.09%
14	10	2	12	0.43%	6.90%	140	28	168	1.51%	75.59%
13	10	1	11	0.39%	7.30%	130	13	143	1.28%	76.88%
12	10	5	15	0.54%	7.83%	120	60	180	1.61%	78.49%
11	9	4	13	0.46%	8.30%	99	44	143	1.28%	79.77%
10	19	2	21	0.75%	9.05%	190	20	210	1.88%	81.66%
9	12	1	13	0.46%	9.51%	108	9	117	1.05%	82.71%
8	25	2	27	0.97%	10.48%	200	16	216	1.94%	84.64%
7	30	3	33	1.18%	11.66%	210	21	231	2.07%	86.72%
6	29	6	35	1.25%	12.91%	174	36	210	1.88%	88.60%
5	41	5	46	1.65%	14.56%	205	25	230	2.06%	90.66%
4	58	8	66	2.36%	16.92%	232	32	264	2.37%	93.03%
3	76	12	88	3.15%	20.06%	228	36	264	2.37%	95.40%
2	130	14	144	5.15%	25.21%	260	28	288	2.58%	97.98%
1	201	24	225	8.05%	33.26%	201	24	225	2.02%	100.00%
0	1698	168	1866	66.74%	100.00%	0	0	0	0.00%	
TOTAL	2520	276	2796	100.00%		10210	939	11149	100.00%	

Long Distance Calling for Southern Bell Exchanges, As Follows:

Study Period 02/11/91 through 03/13/91

Route: TRENTON TO NEWBERRY

NUMBER OF ACCOUNTS MAKING CALLS AT THESE LEVELS

NUMBER OF MESSAGES PLACED BY THESE LEVELS

MESSAGE LEVEL PER ACCOUNT	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCUM. PERCENT OF TOTAL	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCUM. PERCENT OF TOTAL
26 +	41	15	56	2.27%	2.27%	1877	778	2655	39.75%	39.75%
25	0	1	1	0.04%	2.31%	0	25	25	0.37%	40.13%
24	3	0	3	0.12%	2.43%	72	0	72	1.08%	41.20%
23	3	0	3	0.12%	2.55%	69	0	69	1.03%	42.24%
22	5	2	7	0.28%	2.84%	110	44	154	2.31%	44.54%
21	2	1	3	0.12%	2.96%	42	21	63	0.94%	45.49%
20	5	1	6	0.24%	3.20%	100	20	120	1.80%	47.28%
19	5	1	6	0.24%	3.45%	95	19	114	1.71%	48.99%
18	4	2	6	0.24%	3.69%	72	36	108	1.62%	50.61%
17	1	2	3	0.12%	3.81%	17	34	51	0.76%	51.37%
16	4	1	5	0.20%	4.01%	64	16	80	1.20%	52.57%
15	4	1	5	0.20%	4.22%	60	15	75	1.12%	53.69%
14	8	6	14	0.57%	4.79%	112	84	196	2.93%	56.63%
13	12	2	14	0.57%	5.35%	156	26	182	2.72%	59.35%
12	14	1	15	0.61%	5.96%	168	12	180	2.70%	62.05%
11	11	2	13	0.53%	6.49%	121	22	143	2.14%	64.19%
10	18	4	22	0.89%	7.38%	180	40	220	3.29%	67.48%
9	16	4	20	0.81%	8.19%	144	36	180	2.70%	70.18%
8	22	7	29	1.18%	9.37%	176	56	232	3.47%	73.65%
7	33	6	39	1.58%	10.95%	231	42	273	4.09%	77.74%
6	17	9	26	1.05%	12.00%	102	54	156	2.34%	80.07%
5	36	11	47	1.91%	13.91%	180	55	235	3.52%	83.59%
4	50	13	63	2.55%	16.46%	200	52	252	3.77%	87.36%
3	75	22	97	3.93%	20.40%	225	66	291	4.36%	91.72%
2	132	20	152	6.16%	26.56%	264	40	304	4.55%	96.27%
1	220	29	249	10.10%	36.66%	220	29	249	3.73%	100.00%
0	1366	196	1562	63.34%	100.00%	0	0	0	0.00%	
TOTAL	2107	359	2466	100.00%		5057	1622	6679	100.00%	

ong Distance Calling for Southern Bell Exchanges, As Follows:

tudy Period 02/01/91 through 03/03/91

oute: NEWBERRY (POCKET) TO TRENTON

NUMBER OF ACCOUNTS MAKING CALLS AT THESE LEVELS      NUMBER OF MESSAGES PLACED BY THESE LEVELS

MESSAGE LEVEL PER ACCOUNT	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCUM. PERCENT OF TOTAL	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCUM. PERCENT OF TOTAL
26 +	91	2	93	12.77%	12.77%	6123	58	6181	72.22%	72.22%
25	5	0	5	0.69%	13.46%	125	0	125	1.46%	73.68%
24	3	0	3	0.41%	13.87%	72	0	72	0.84%	74.52%
23	1	0	1	0.14%	14.01%	23	0	23	0.27%	74.79%
22	3	1	4	0.55%	14.56%	66	22	88	1.03%	75.81%
21	3	0	3	0.41%	14.97%	63	0	63	0.74%	76.55%
20	7	1	8	1.10%	16.07%	140	20	160	1.87%	78.42%
19	1	0	1	0.14%	16.21%	19	0	19	0.22%	78.64%
18	3	0	3	0.41%	16.62%	54	0	54	0.63%	79.27%
17	6	1	7	0.96%	17.58%	102	17	119	1.39%	80.66%
16	10	0	10	1.37%	18.96%	160	0	160	1.87%	82.53%
15	6	1	7	0.96%	19.92%	90	15	105	1.23%	83.76%
14	4	0	4	0.55%	20.47%	56	0	56	0.65%	84.41%
13	3	0	3	0.41%	20.88%	39	0	39	0.46%	84.87%
12	5	2	7	0.96%	21.84%	60	24	84	0.98%	85.85%
11	7	1	8	1.10%	22.94%	77	11	88	1.03%	86.88%
10	6	0	6	0.82%	23.76%	60	0	60	0.70%	87.58%
9	11	1	12	1.65%	25.41%	99	9	108	1.26%	88.84%
8	14	0	14	1.92%	27.34%	112	0	112	1.31%	90.15%
7	17	0	17	2.34%	29.67%	119	0	119	1.39%	91.54%
6	20	1	21	2.88%	32.55%	120	6	126	1.47%	93.01%
5	26	1	27	3.71%	36.26%	130	5	135	1.58%	94.59%
4	39	1	40	5.49%	41.76%	156	4	160	1.87%	96.46%
3	38	1	39	5.36%	47.12%	114	3	117	1.37%	97.83%
2	50	3	53	7.28%	54.40%	100	6	106	1.24%	99.07%
1	76	4	80	10.99%	65.38%	76	4	80	0.93%	100.00%
0	233	19	252	34.62%	100.00%	0	0	0	0.00%	
TOTAL	688	40	728	100.00%		8355	204	8559	100.00%	

Long Distance Calling for Southern Bell Exchanges, As Follows:

Study Period 02/01/91 through 03/03/91

Route: TRENTON TO NEWBERRY (POCKET)

NUMBER OF ACCOUNTS MAKING CALLS AT THESE LEVELS

NUMBER OF MESSAGES PLACED BY THESE LEVELS

MESSAGE LEVEL PER ACCOUNT	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCUM. PERCENT OF TOTAL	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCUM. PERCENT OF TOTAL
26 +	33	6	39	1.49%	1.49%	1492	444	1936	40.55%	40.55%
25	3	1	4	0.15%	1.64%	75	25	100	2.09%	42.65%
24	2	1	3	0.11%	1.76%	48	24	72	1.51%	44.16%
23	2	1	3	0.11%	1.87%	46	23	69	1.45%	45.60%
22	1	0	1	0.04%	1.91%	22	0	22	0.46%	46.06%
21	1	0	1	0.04%	1.95%	21	0	21	0.44%	46.50%
20	1	0	1	0.04%	1.99%	20	0	20	0.42%	46.92%
19	1	2	3	0.11%	2.10%	19	38	57	1.19%	48.11%
18	1	1	2	0.08%	2.18%	18	18	36	0.75%	48.87%
17	6	1	7	0.27%	2.45%	102	17	119	2.49%	51.36%
16	2	1	3	0.11%	2.56%	32	16	48	1.01%	52.37%
15	4	0	4	0.15%	2.72%	60	0	60	1.26%	53.62%
14	8	0	8	0.31%	3.02%	112	0	112	2.35%	55.97%
13	7	2	9	0.34%	3.37%	91	26	117	2.45%	58.42%
12	9	1	10	0.38%	3.75%	108	12	120	2.51%	60.93%
11	5	3	8	0.31%	4.06%	55	33	88	1.84%	62.78%
10	15	3	18	0.69%	4.74%	150	30	180	3.77%	66.55%
9	14	7	21	0.80%	5.55%	126	63	189	3.96%	70.51%
8	10	7	17	0.65%	6.20%	80	56	136	2.85%	73.36%
7	15	2	17	0.65%	6.85%	105	14	119	2.49%	75.85%
6	18	9	27	1.03%	7.88%	108	54	162	3.39%	79.24%
5	18	14	32	1.22%	9.10%	90	70	160	3.35%	82.59%
4	44	14	58	2.22%	11.32%	176	56	232	4.86%	87.45%
3	45	10	55	2.10%	13.43%	135	30	165	3.46%	90.91%
2	95	17	112	4.28%	17.71%	190	34	224	4.69%	95.60%
1	180	30	210	8.03%	25.75%	180	30	210	4.40%	100.00%
0	1652	289	1941	74.25%	100.00%	0	0	0	0.00%	
TOTAL	2192	422	2614	100.00%		3661	1113	4774	100.00%	

Long Distance Calling for Southern Bell Exchanges, As Follows:

Study Period 02/01/91 through 03/03/91

Route: NEWBERRY TO TRENTON (POCKET)

NUMBER OF ACCOUNTS MAKING CALLS AT THESE LEVELS

NUMBER OF MESSAGES PLACED BY THESE LEVELS

MESSAGE LEVEL PER ACCOUNT	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCU. PERCENT OF TOTAL	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCU. PERCENT OF TOTAL
26 +	91	5	96	3.27%	3.27%	5753	191	5944	59.38%	59.38%
25	4	1	5	0.17%	3.44%	100	25	125	1.25%	60.63%
24	3	1	4	0.14%	3.58%	72	24	96	0.96%	61.59%
23	2	0	2	0.07%	3.65%	46	0	46	0.46%	62.05%
22	5	1	6	0.20%	3.85%	110	22	132	1.32%	63.37%
21	2	0	2	0.07%	3.92%	42	0	42	0.42%	63.79%
20	11	3	14	0.48%	4.40%	220	60	280	2.80%	66.58%
19	4	0	4	0.14%	4.54%	76	0	76	0.76%	67.34%
18	3	0	3	0.10%	4.64%	54	0	54	0.54%	67.88%
17	5	3	8	0.27%	4.91%	85	51	136	1.36%	69.24%
16	13	0	13	0.44%	5.35%	208	0	208	2.08%	71.32%
15	7	1	8	0.27%	5.63%	105	15	120	1.20%	72.52%
14	7	3	10	0.34%	5.97%	98	42	140	1.40%	73.92%
13	7	2	9	0.31%	6.28%	91	26	117	1.17%	75.08%
12	12	4	16	0.55%	6.82%	144	48	192	1.92%	77.00%
11	5	2	7	0.24%	7.06%	55	22	77	0.77%	77.77%
10	17	2	19	0.65%	7.71%	170	20	190	1.90%	79.67%
9	13	4	17	0.58%	8.29%	117	36	153	1.53%	81.20%
8	25	2	27	0.92%	9.21%	200	16	216	2.16%	83.36%
7	23	3	26	0.89%	10.10%	161	21	182	1.82%	85.17%
6	38	6	44	1.50%	11.60%	228	36	264	2.64%	87.81%
5	50	5	55	1.88%	13.47%	250	25	275	2.75%	90.56%
4	50	4	54	1.84%	15.31%	200	16	216	2.16%	92.72%
3	69	11	80	2.73%	18.04%	207	33	240	2.40%	95.11%
2	113	13	126	4.30%	22.34%	226	26	252	2.52%	97.63%
1	213	24	237	8.08%	30.42%	213	24	237	2.37%	100.00%
0	1820	220	2040	69.58%	100.00%	0	0	0	0.00%	
TOTAL	2612	320	2932	100.00%		9231	779	10010	100.00%	

Long Distance Calling for Southern Bell Exchanges, As Follows:

Study Period 02/01/91 through 03/03/91

Route: TRENTON (POCKET) TO NEWBERRY

NUMBER OF ACCOUNTS MAKING CALLS AT THESE LEVELS

NUMBER OF MESSAGES PLACED BY THESE LEVELS

MESSAGE LEVEL PER ACCOUNT	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCU. PERCENT OF TOTAL	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCU. PERCENT OF TOTAL
26 +	43	8	51	2.63%	2.63%	2080	403	2483	41.05%	41.05%
25	2	1	3	0.15%	2.78%	50	25	75	1.24%	42.29%
24	2	0	2	0.10%	2.89%	48	0	48	0.79%	43.08%
23	1	2	3	0.15%	3.04%	23	46	69	1.14%	44.22%
22	1	1	2	0.10%	3.14%	22	22	44	0.73%	44.95%
21	2	0	2	0.10%	3.25%	42	0	42	0.69%	45.64%
20	2	1	3	0.15%	3.40%	40	20	60	0.99%	46.64%
19	2	2	4	0.21%	3.61%	38	38	76	1.26%	47.89%
18	4	2	6	0.31%	3.92%	72	36	108	1.79%	49.68%
17	8	1	9	0.46%	4.38%	136	17	153	2.53%	52.21%
16	3	2	5	0.26%	4.64%	48	32	80	1.32%	53.53%
15	10	2	12	0.62%	5.26%	150	30	180	2.98%	56.51%
14	9	0	9	0.46%	5.72%	126	0	126	2.08%	58.59%
13	8	6	14	0.72%	6.44%	104	78	182	3.01%	61.60%
12	13	4	17	0.88%	7.32%	156	48	204	3.37%	64.97%
11	11	4	15	0.77%	8.09%	121	44	165	2.73%	67.70%
10	18	6	24	1.24%	9.33%	180	60	240	3.97%	71.66%
9	14	3	17	0.88%	10.21%	126	27	153	2.53%	74.19%
8	13	3	16	0.82%	11.03%	104	24	128	2.12%	76.31%
7	22	0	22	1.13%	12.16%	154	0	154	2.55%	78.86%
6	22	9	31	1.60%	13.76%	132	54	186	3.07%	81.93%
5	23	10	33	1.70%	15.46%	115	50	165	2.73%	84.66%
4	50	9	59	3.04%	18.51%	200	36	236	3.90%	88.56%
3	61	14	75	3.87%	22.37%	183	42	225	3.72%	92.28%
2	109	20	129	6.65%	29.02%	218	40	258	4.27%	96.54%
1	185	24	209	10.77%	39.79%	185	24	209	3.46%	100.00%
0	1011	157	1168	60.21%	100.00%	0	0	0	0.00%	
TOTAL	1649	291	1940	100.00%		4853	1196	6049	100.00%	

Long Distance Calling for Southern Bell Exchanges, As Follows:

Study Period 02/01/91 through 03/03/91

Route: NEWBERRY (POCKET) TO TRENTON (POCKET)

NUMBER OF ACCOUNTS MAKING CALLS AT THESE LEVELS

NUMBER OF MESSAGES PLACED BY THESE LEVELS

MESSAGE LEVEL PER ACCOUNT	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCUM. PERCENT OF TOTAL	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCUM. PERCENT OF TOTAL
26 +	79	1	80	10.99%	10.99%	4909	32	4941	69.85%	69.85%
25	2	0	2	0.27%	11.26%	50	0	50	0.71%	70.55%
24	1	0	1	0.14%	11.40%	24	0	24	0.34%	70.89%
23	2	0	2	0.27%	11.68%	46	0	46	0.65%	71.54%
22	4	0	4	0.55%	12.23%	88	0	88	1.24%	72.79%
21	0	0	0	0.00%	12.23%	0	0	0	0.00%	72.79%
20	9	1	10	1.37%	13.60%	180	20	200	2.83%	75.61%
19	1	0	1	0.14%	13.74%	19	0	19	0.27%	75.88%
18	2	0	2	0.27%	14.01%	36	0	36	0.51%	76.39%
17	3	2	5	0.69%	14.70%	51	34	85	1.20%	77.59%
16	8	0	8	1.10%	15.80%	128	0	128	1.81%	79.40%
15	7	0	7	0.96%	16.76%	105	0	105	1.48%	80.89%
14	6	0	6	0.82%	17.58%	84	0	84	1.19%	82.08%
13	1	1	2	0.27%	17.86%	13	13	26	0.37%	82.44%
12	6	3	9	1.24%	19.09%	72	36	108	1.53%	83.97%
11	3	0	3	0.41%	19.51%	33	0	33	0.47%	84.44%
10	8	1	9	1.24%	20.74%	80	10	90	1.27%	85.71%
9	10	1	11	1.51%	22.25%	90	9	99	1.40%	87.11%
8	12	0	12	1.65%	23.90%	96	0	96	1.36%	88.46%
7	10	0	10	1.37%	25.27%	70	0	70	0.99%	89.45%
6	21	0	21	2.88%	28.16%	126	0	126	1.78%	91.24%
5	31	2	33	4.53%	32.69%	155	10	165	2.33%	93.57%
4	32	1	33	4.53%	37.23%	128	4	132	1.87%	95.43%
3	44	0	44	6.04%	43.27%	132	0	132	1.87%	97.30%
2	53	2	55	7.55%	50.82%	106	4	110	1.55%	98.85%
1	76	5	81	11.13%	61.95%	76	5	81	1.15%	100.00%
0	257	20	277	38.05%	100.00%	0	0	0	0.00%	
TOTAL	688	40	728	100.00%		6897	177	7074	100.00%	

Long Distance Calling for Southern Bell Exchanges, As Follows:

Study Period 02/01/91 through 03/03/91

Route: TRENTON (POCKET) TO NEWBERRY (POCKET)

NUMBER OF ACCOUNTS MAKING CALLS AT THESE LEVELS

NUMBER OF MESSAGES PLACED BY THESE LEVELS

MESSAGE LEVEL PER ACCOUNT	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCU. PERCENT OF TOTAL	RES	BUS	RES BUS TOTAL	PERCENT OF TOTAL	ACCU. PERCENT OF TOTAL
26 +	29	4	33	1.70%	1.70%	1348	223	1571	40.04%	40.04%
25	3	0	3	0.15%	1.86%	75	0	75	1.91%	41.95%
24	1	1	2	0.10%	1.96%	24	24	48	1.22%	43.17%
23	1	1	2	0.10%	2.06%	23	23	46	1.17%	44.34%
22	1	0	1	0.05%	2.11%	22	0	22	0.56%	44.90%
21	1	0	1	0.05%	2.16%	21	0	21	0.54%	45.44%
20	0	0	0	0.00%	2.16%	0	0	0	0.00%	45.44%
19	1	2	3	0.15%	2.32%	19	38	57	1.45%	46.89%
18	1	1	2	0.10%	2.42%	18	18	36	0.92%	47.81%
17	3	2	5	0.26%	2.68%	51	34	85	2.17%	49.97%
16	1	1	2	0.10%	2.78%	16	16	32	0.82%	50.79%
15	4	0	4	0.21%	2.99%	60	0	60	1.53%	52.32%
14	8	0	8	0.41%	3.40%	112	0	112	2.85%	55.17%
13	7	2	9	0.46%	3.87%	91	26	117	2.98%	58.15%
12	9	1	10	0.52%	4.38%	108	12	120	3.06%	61.21%
11	5	1	6	0.31%	4.69%	55	11	66	1.68%	62.90%
10	12	2	14	0.72%	5.41%	120	20	140	3.57%	66.46%
9	13	2	15	0.77%	6.19%	117	18	135	3.44%	69.90%
8	10	5	15	0.77%	6.96%	80	40	120	3.06%	72.96%
7	12	2	14	0.72%	7.68%	84	14	98	2.50%	75.46%
6	14	6	20	1.03%	8.71%	84	36	120	3.06%	78.52%
5	15	9	24	1.24%	9.95%	75	45	120	3.06%	81.57%
4	40	10	50	2.58%	12.53%	160	40	200	5.10%	86.67%
3	42	10	52	2.68%	15.21%	126	30	156	3.98%	90.65%
2	79	15	94	4.85%	20.05%	158	30	188	4.79%	95.44%
1	150	29	179	9.23%	29.28%	150	29	179	4.56%	100.00%
0	1187	185	1372	70.72%	100.00%	0	0	0	0.00%	
TOTAL	1649	291	1940	100.00%		3197	727	3924	100.00%	









ENHANCED OPTIONAL EXTENDED AREA SERVICE (EOEAS)

<u>Route</u>	<u>Class of Service</u>	<u>Option</u>	<u>Number of Customers</u>	<u>Rate</u>	
Newberry to Trenton	Residence	Premium	155	\$4.70	
		Discount	3	\$2.20	
		Incoming	6	\$4.95	
		Drop-Back	2	\$7.70	
	Business	Discount	2	\$4.40	
		Incoming	0	\$10.80	
		Drop-Back	0	\$20.80	
	PBX/ESSX	Discount	0	\$8.80	
		Incoming	0	\$16.20	
	Trenton to Newberry & Gainesville	Residence	Premium	159	\$9.25
			Discount	9	\$3.80
			Incoming	5	\$4.95
Drop-Back			N/A	N/A	
Business		Discount	13	\$7.60	
		Incoming	2	\$10.80	
		Drop-Back	N/A	N/A	
PBX/ESSX		Discount	0	\$15.20	
		Incoming	0	\$16.20	

NOTE: Rates are in addition to monthly local exchange service rates.

ECONOMIC IMPACT OF COUNTYWIDE EAS AT FULL COST RECOVERY RATES

Customer Impact  
 (costs spread among all customers Newberry)

<u>Exchange</u>	<u>EAS Additive</u>			<u>Regrouping Additive</u>			<u>Total EAS Additive</u>		
	<u>1FR</u> \$	<u>1FB</u> \$	<u>PBX</u> \$	<u>1FR</u> \$	<u>1FB</u> \$	<u>PBX</u> \$	<u>1FR</u> \$	<u>1FB</u> \$	<u>PBX</u> \$
Newberry	2.94	7.95	17.91	0	0	0	2.94	7.95	17.91
Trenton	0	0	0	.40	1.10	2.42	.40	1.10	2.42

Customer Impact  
 (costs spread among all customers Trenton)

<u>Exchange</u>	<u>EAS Additive</u>			<u>Regrouping Additive</u>			<u>Total EAS Additive</u>		
	<u>1FR</u> \$	<u>1FB</u> \$	<u>PBX</u> \$	<u>1FR</u> \$	<u>1FB</u> \$	<u>PBX</u> \$	<u>1FR</u> \$	<u>1FB</u> \$	<u>PBX</u> \$
Newberry	0	0	0	0	0	0	0	0	0
Trenton	2.92	7.88	17.80	.40	1.10	2.42	3.32	8.98	20.22

Customer Impact  
 (costs spread among all customers in Newberry & Trenton)

<u>Exchange</u>	<u>EAS Additive</u>			<u>Regrouping Additive</u>			<u>Total EAS Additive</u>		
	<u>1FR</u> \$	<u>1FB</u> \$	<u>PBX</u> \$	<u>1FR</u> \$	<u>1FB</u> \$	<u>PBX</u> \$	<u>1FR</u> \$	<u>1FB</u> \$	<u>PBX</u> \$
Newberry	1.46	3.96	8.93	0	0	0	1.46	3.96	8.93
Trenton	1.46	3.96	8.93	.40	1.10	2.42	1.86	5.06	11.35