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ORIGINAL  
FILE COPY

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May 10, 1991

Steve C. Tribble, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 E. Gaines Street  
Tallahassee, Florida 32301

Re: **Docket No. 870790-TL** - Gilchrist County EAS

Dear Mr. Tribble:

Enclosed please find the original and fifteen (15) copies of  
Gilchrist County's rebuttal testimony of Charles Watson.

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.

Yours truly,

ACK *Susan Hardyman*

AFA Theodore M. Burt

APP TMB/sh

CAF \_\_\_\_\_

Signed in Mr. Burt's absence to avoid delay.

CMU Enclosures: Testimony - 15 copies

CTR \_\_\_\_\_ Letter - copy

ENG \_\_\_\_\_

LEG 1

LIN 6  
89-046.002

OPC \_\_\_\_\_

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OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

04712 MAY 13 1991

PSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 870790-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 10<sup>th</sup> day of May, 1991, to:

Debra Schiro  
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Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0863

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Live Oak, Florida 32060

Michael W. Tye  
AT&T Communications of the  
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106 East College Avenue #1410  
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TESTIMONY OF CHARLES WATSON

DOCKET NO. 870790-TL

EXTENDED AREA SERVICE

GILCHRIST COUNTY

MAY 9, 1991

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. MY NAME IS CHARLES WATSON AND MY ADDRESS IS ROUTE 2, BOX  
282, TRENTON, FLORIDA.

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

A. I AM CURRENTLY SELF-EMPLOYED AS A FARMER IN GILCHRIST  
COUNTY, FLORIDA. I WAS FORMERLY EMPLOYED BY SOUTHERN BELL  
TELEPHONE AND TELEGRAPH COMPANY AS AN OUTSIDE PLANT  
ENGINEER. IN MY LAST FIVE YEARS WITH SOUTHERN BELL I WAS  
A TRANSMISSION ENGINEER.

Q. DO YOU CURRENTLY HAVE TELEPHONE SERVICE?

A. YES. MY TELEPHONE SERVICE IS PROVIDED BY THE NEWBERRY  
EXCHANGE AND I HAVE OPTED TO PARTICIPATE IN EOEAS OPTION  
WHICH RECENTLY WAS PROVIDED BY SOUTHERN BELL FOR TELEPHONE  
USERS IN THE NEWBERRY EXCHANGE GIVING THOSE CUSTOMERS A  
LESS EXPENSIVE, FIXED RATE ACCESS TO THE TRENTON EXCHANGE.

1 Q. WHY DID YOU OPT TO USE THE FIXED RATE AND LESS EXPENSIVE  
2 MEANS OF CALLING TO THE TRENTON EXCHANGE?

3

4 A. PRIOR TO MY ELECTION TO USE THE OPTION PROVIDED BY SOUTHERN  
5 BELL, IT WAS A TOLL CALL TO MY PARENTS WHO LIVE THREE MILES  
6 FROM ME.

7

8 Q. BY SOUTHERN BELL IMPLEMENTING THE EOEAS, IS THAT AN  
9 INDICATION THAT COMMUNITY OF INTEREST STUDIES CAN BE MADE  
10 IN A MORE LIMITED AREA FOR A POCKET. FOR INSTANCE, JUST THE  
11 NEWBERRY EXCHANGE LOCATED WITHIN GILCHRIST COUNTY?

12

13 A. YES. AS POINTED OUT BY THE TESTIMONY OF S.E. SANDERS, WITH  
14 PARTICULAR REFERENCE TO THE ATTACHMENT TO HER TESTIMONY,  
15 BEING EXHIBIT 4, PAGE 7, SOUTHERN BELL ACTUALLY STUDIED A  
16 NEWBERRY POCKET TO TRENTON POCKET WHICH SHOWS THAT THAT  
17 PARTICULAR POCKET OF NEWBERRY CUSTOMERS HAS A HIGH COMMUNITY  
18 OF INTEREST WITH THE TRENTON EXCHANGE AND MEETS THE  
19 COMMISSION'S RULE RELATING TO COMMUNITY OF INTEREST.

20

21 Q. ARE YOU FAMILIAR WITH THE COMMISSION'S RULE ON COMMUNITY  
22 OF INTEREST?

23

24 A. YES.

25

26 Q. DOES APPLICATION OF THE COMMISSION'S RULE RELATING TO  
27 COMMUNITY OF INTEREST HAVE A SIGNIFICANT NEGATIVE BEARING

1 ON GILCHRIST COUNTY?

2

3 A. YES. THREE OF THE EXCHANGES SERVING GILCHRIST COUNTY HAVE  
4 SUBSTANTIAL SUBSCRIBERS OUTSIDE OF GILCHRIST COUNTY, WHICH  
5 IN FACT DISTORTS THE STUDY AS IT RELATES TO THE COMMUNITY  
6 OF INTEREST AS DESCRIBED BY THE RULE. THAT IS, THE STUDY IS  
7 DISTORTED BY THE RULE SINCE IT IS USING ENTIRE EXCHANGES  
8 INSTEAD OF THE GILCHRIST COUNTY POCKETS. IT IS MY OPINION  
9 THE REAL COMMUNITY OF INTEREST LIES WITH THE SUBSCRIBERS  
10 ONLY WITHIN GILCHRIST COUNTY. FOR INSTANCE, IN MS.  
11 SANDERS TESTIMONY AT PAGE 7 BEGINNING WITH LINE 20, SHE  
12 CONFIRMS THAT WHEN THE STUDY IS LIMITED TO THE GILCHRIST  
13 COUNTY POCKET WITHIN THE NEWBERRY EXCHANGE, A COMMUNITY OF  
14 INTEREST DOES EXIST. PERSONALLY, I WOULD LIKE TO SEE A  
15 STUDY DONE OF JUST GILCHRIST COUNTY SUBSCRIBERS IN ALL  
16 POCKETS, SUCH AS THE ONE DONE BETWEEN NEWBERRY AND TRENTON.  
17 IT IS OBVIOUS THAT WHEN LOOKING AT THE NEWBERRY EXCHANGE,  
18 WHERE THERE ARE A TOTAL 2,932 NEWBERRY LINES, OF WHICH 728  
19 ARE IN GILCHRIST COUNTY, MOST OF THE NEWBERRY SUBSCRIBERS  
20 ARE NOT GOING TO HAVE A COMMUNITY OF INTEREST WITH GILCHRIST  
21 COUNTY. HOWEVER, WHEN LOOKING JUST AT THE GILCHRIST COUNTY  
22 SUBSCRIBERS ON THE NEWBERRY EXCHANGE, IT IS CONFIRMED  
23 THAT THERE IS A COMMUNITY OF INTEREST.

24

25 Q. ARE YOU FAMILIAR WITH THE NUMBER OF SUBSCRIBERS ON THE HIGH  
26 SPRINGS EXCHANGE AND THE BRANFORD EXCHANGE?

1 A. I AM FAMILIAR WITH THOSE NUMBERS ONLY BY THE TESTIMONY  
2 PRESENTED BY HARRIET EUDY WITH ALLTEL. SHE TESTIFIED THAT  
3 THERE ARE A TOTAL OF 3,286 SUBSCRIBERS ON THE HIGH SPRINGS  
4 EXCHANGE, OF WHICH 321 ARE IN THE GILCHRIST COUNTY POCKET.  
5 REGARDING THE BRANFORD EXCHANGE, THERE ARE A TOTAL OF 2,698  
6 SUBSCRIBERS OF WHICH 580 ARE IN THE GILCHRIST COUNTY  
7 POCKET. I DID NOT SEE A STUDY OF THOSE POCKET EXCHANGES IN  
8 RELATIONSHIP TO THE NUMBER OF CALLS BETWEEN THOSE POCKETS  
9 AND THE TRENTON EXCHANGE. HOWEVER, IT IS MY OPINION THERE  
10 WOULD NOT BE A COMMUNITY OF INTEREST BETWEEN THE ENTIRE  
11 BRANFORD EXCHANGE AND THE TRENTON EXCHANGE, NOR THE HIGH  
12 SPRINGS EXCHANGE AND THE TRENTON EXCHANGE. HOWEVER, THERE  
13 WOULD LIKELY BE A COMMUNITY OF INTEREST BETWEEN THE  
14 GILCHRIST COUNTY POCKETS OF EACH OF THOSE EXCHANGES WITH  
15 THE TRENTON EXCHANGE.

16

17 Q. ARE YOU FAMILIAR WITH THE REASONS BEHIND GILCHRIST COUNTY  
18 BEING PROVIDED TELEPHONE SERVICES THROUGH SO MANY DIFFERENT  
19 EXCHANGES?

20

21 A. HISTORICALLY THE AREA WAS DIVIDED UP YEARS AGO BASED UPON  
22 ACCESSIBILITY, THE NEAREST TELEPHONE EXCHANGE AND  
23 TELEPHONE COMPANY. THE CRITERIA AT THAT PARTICULAR TIME  
24 WAS NOT BASED ON THE PRESENT COMMUNITY OF INTEREST, AS  
25 DEFINED BY THE RULES OF THE PUBLIC SERVICE COMMISSION, BUT  
26 AN ALTOGETHER DIFFERENT CRITERIA. AS PREVIOUSLY POINTED  
27 OUT, THE DIVISION OF GILCHRIST COUNTY INTO SMALL POCKET

1 AREAS WORKS AGAINST GILCHRIST COUNTY, OR THESE POCKET  
2 EXCHANGES, EVER COMING UNDER THE CRITERIA AS SET FORTH IN  
3 THE RULE. THROUGH THE YEARS, THE TECHNOLOGY HAS BEEN  
4 DEVELOPED TO THE EXTENT THAT POCKET EAS SHOULD PRESENT NO  
5 TECHNICAL PROBLEMS AS A SOLUTION TO THE SITUATION. FOR  
6 INSTANCE, THE SERVICE THAT IS NOW BEING PROVIDED AS AN  
7 OPTION BETWEEN NEWBERRY AND TRENTON CONFIRMS THAT THE  
8 TECHNOLOGY EXISTS. I MAKE SPECIFIC REFERENCE TO MS. SANDERS  
9 TESTIMONY. BY OFFERING THE SERVICES REFERRED TO AS "EOEAS",  
10 SOUTHERN BELL HAS IMPLEMENTED "POCKET EAS" ON A CUSTOMER BY  
11 CUSTOMER BASIS. TO IMPLEMENT ON A COUNTY POCKET AREA BASIS  
12 REQUIRES THE SAME TECHNOLOGY.

13

14 Q. AS A SUBSCRIBER OF THE EOEAS SERVICE DO YOU THINK IT IS A  
15 FAIRLY PRICED SERVICE?

16

17 A. NO, I SUBSCRIBE TO THE SERVICE BECAUSE IT IS A BETTER DEAL  
18 THAN PAYING TOLL CHARGES FOR ALL CALLS TO THE TRENTON  
19 EXCHANGE. IT IS INTERESTING TO NOTE THAT MY NEWBERRY  
20 SUBSCRIPTION WHICH IS A COST OF \$8.80 PROVIDES ACCESS FOR ME  
21 TO 89,623 LINES UNDER MY BASIC RATE. WHEN I EXAMINE THE  
22 BASIC RATE FOR THE TRENTON EXCHANGE, I FIND THAT THE BASE  
23 RATE OF \$7.70 PROVIDES ACCESS TO AROUND 5,800 TOTAL LINES.  
24 LOOKING AGAIN AT EXHIBIT 5 OF MS. SANDERS TESTIMONY, THE  
25 DROP BACK OPTION FOR A RESIDENCE SERVICE WAS \$7.70  
26 INDICATING THAT ACCESS TO 87,000 OF THOSE LINES WAS VALUED  
27 AT \$1.10. I MAKE SPECIFIC REFERENCE TO EXHIBIT "A" ATTACHED

1        HERETO WHICH WAS AN INFORMATIONAL DOCUMENT PROVIDED TO ME BY  
2        SOUTHERN BELL AT THE TIME THAT SOUTHERN BELL OFFERED THE  
3        OPTIONAL SERVICE BETWEEN TRENTON AND NEWBERRY. AS YOU CAN  
4        SEE ON THAT EXHIBIT AT ITEM 4, MY MONTHLY BASIC CHARGE FOR  
5        LOCAL SERVICE WOULD BE REDUCED TO \$7.70 FROM \$8.80  
6        INDICATING THAT THE VALUE OF SERVICE FOR ACCESS TO ALACHUA,  
7        ARCHER, GAINESVILLE AND HIGH SPRINGS FROM THE NEWBERRY  
8        EXCHANGE IS \$1.10 A MONTH PER SUBSCRIBER. TO GAIN TWO-WAY  
9        ACCESS TO THE 2500 LINES IN THE TRENTON EXCHANGE, IT WOULD  
10       COST ME \$4.70 PER MONTH FOR ONE-WAY CALLING TO TRENTON AND  
11       \$4.95 PER MONTH PLUS 50% OF THE NORMAL TOLL CHARGES FOR  
12       PERSONS CALLING ME. SO, IF I GIVE UP 87,000 LINES IT'S  
13       WORTH \$1.10 BUT IF I WANT ACCESS TO 2500 LINES IT WILL COST  
14       \$9.65 PER MONTH PLUS 50% OF THE NORMAL TOLL CHARGE ON IN-  
15       COMING CALLS. I DON'T CONSIDER THAT A FAIR TRADE. WHAT I  
16       WOULD DO IS TRADE ACCESS TO ARCHER, ALACHUA AND HIGH SPRINGS  
17       FOR TRENTON AND CHIEFLAND. THAT WOULD BE A MORE EVEN TRADE.

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