



United Telephone Company of Florida  
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Alan N. Berg  
Senior Attorney

May 31, 1991

Mr. Steve Tribble  
Director, Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0850

**ORIGINAL  
FILE COPY**

Re: Docket No. 910060-TP

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket are the original and (15) copies of a Petition requesting a hearing of the Proposed Amendment to Rule 4.110, F.A.C., on behalf of United Telephone Company of Florida.

A copy of the foregoing has been furnished to all Parties of Record as shown on the attached Certificate of Service.

Sincerely,

Alan N. Berg

ACK  ANB/ab

FA  Enclosures

APP  cc: Parties of Record

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FC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Amendment of Rule 4.110, F.A.C. ) Docket No. 910060-TP  
pertaining to customer billing. ) Filed: May 31, 1991  
\_\_\_\_\_ )

PETITION OF UNITED TELEPHONE COMPANY OF FLORIDA

United Telephone Company of Florida (hereinafter "United") pursuant to the provision of Florida Public Service Commission (hereinafter "FPSC") Rules 25-22.016 and 25-22.036, Florida Administrative Code, files this Petition requesting a hearing of the Proposed Amendment to Rule 25-4.110, F.A.C., described in FPSC Order No. 24477, issued May 6, 1991. In support of this request, United states:

1. The exact name of the Petitioner and the address of its principal business office is:

United Telephone Company of Florida  
P. O. Box 5000  
Altamonte Springs, Florida 32716-5000

2. The name and address of the person authorized to receive notice and communications in respect to this Petition are:

Alan N. Berg  
United Telephone Company of Florida  
P. O. Box 5000  
Altamonte Springs, Florida 32716-5000

3. United is a telecommunications company as that term is defined in Section 364.02(7), Florida Statutes (1990 Supp.). United provides and bills for 976 service, and bills for 900 service for providers of that service. United is substantially affected by the proposed amendment to Rule 25-4.110, F.A.C.

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described in FPSC Order No. 24477, issued May 6, 1991, which proposes new billing requirements for 900 and 976 service.

4. United is requesting a hearing for two reasons:

a. The proposed amendment to Rule 25-4.110, F.A.C., allows no time for implementation, and United estimates that it will take eight months to complete the programming changes necessary to modify its billing system to meet the requirements of the proposed amendment to Rule 25-4.110, F.A.C. FPSC Order No. 24477 states at page 3 that: "Some companies indicated a necessity of six months to one year to implement the proposed billing changes." The Order does not further discuss or provide for any period to implement the changes required by the proposed amendment to Rule 25-4.110.

b. The economic impact statement contained in FPSC Order No. 24477 at pages 2-3 states that: "Over the long term, additional expenses incurred by regulated utilities would be passed on to information providers and their customers." United estimates that it will cost \$130,000 to implement the changes required by the proposed amendment to Rule 25-4.110, F.A.C. The amount will be expended in the eight months United estimates it will take to implement the changes, not in the long term. The economic impact statement contained in FPSC Order No. 24477 at page 3 also describes 900 and 976 services as nonregulated. United's 976 service is a regulated and tariffed service. United does not have the ability in the short term to recover the funds required to implement the changes required by proposed amendment to Rule 25-4.110, nor is any means for such recovery proposed in Order No.

24477. Long term recovery from "information providers and their customers" as is suggested by the economic impact statement, is speculative at best. United may have no means of recovering the costs incurred in implementing the changes required by the amendments to Rule 25-4.110.

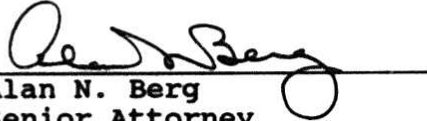
5. The disputed issues of material fact in regard to this Petition are: 1) FPSC Order No. 24477 and the proposed amendment to Rule 25-4.110 contained therein, fail to provide any period of implementation for changes to complex billing systems, and 2) FPSC Order No. 24477 and the amendment to Rule 25-4.110 contained therein fail to provide any method to recover the cost of implementation of the changes to United's billing system, and the conclusions in the supporting economic impact statement are based on an unfounded assumption that such costs can be recovered from "information providers and their customers" in the long term, and that 900 and 976 service are unregulated.

6. The ultimate facts alleged by United are listed in paragraph 4 above.

7. The specific relief being requested by United is the provision of an implementation period of eight months to implement the changes contained in the proposed amendment to Rule 25-4.110, the correction of unfounded assumptions and the conclusions based on those assumptions in the economic impact statement supporting the proposed amendment of Rule 25-4.110, and the provision of a method of recovery of the cost of implementing the changes required by the proposed amendment to Rule 25-4.110.

Wherefore, United requests a hearing on the proposed amendment to Rule 25-4.110 to address the above-stated matters.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Alan N. Berg", is written over a horizontal line.

Alan N. Berg  
Senior Attorney  
United Telephone Company of Florida  
P.O. Box 5000  
Altamonte Springs, Florida 32716-5000

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 910060-TP**

**I HEREBY CERTIFY that a copy of the Petition of United Telephone Company of Florida has been furnished by U. S. Mail or hand delivery this 31st day of May 1991 to the following parties:**

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