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June 3, 1991

(904) 878-7138

Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

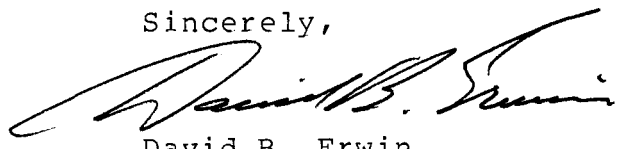
Dear Mr. Tribble:

Enclosed please find the original and 15 copies of a Prehearing Statement of ALLTEL Florida, Inc. This is being filed on behalf of ALLTEL Florida, Inc.

Copies have been sent to others as reflected on the attached certificate of service.

Thank you for your prompt attention to this filing.

Sincerely,



David B. Erwin

- ACK
- AFA _____
- DBE:tlh APP _____
- Enclosures CAF _____
- GMLJ
- CTR _____
- EAG _____
- LEG 1
- LIN 6
- OPC _____
- RCM _____
- SEC 1
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE
05537 JUN-3 1991
80-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for)
extended area service)
(EAS) throughout)
Gilchrist County)

Docket No. 870790-TL

Filed: June 3, 1991

PREHEARING STATEMENT
OF ALLTEL FLORIDA, INC.

ALLTEL Florida, Inc. (ALLTEL) through its undersigned attorney, and pursuant to Order No. 24257, files this prehearing statement.

(a) All known witnesses:

Harriet Eudy will be the only witness for ALLTEL. She has prefiled testimony, and she will sponsor each ALLTEL exhibit.

(b) All known exhibits:

<u>Witness</u>	<u>Document</u>	<u>Title</u>
Harriet Eudy	HE-1	Percent of Access Lines in County
Harriet Eudy	HE-2	County-wide and County Seat Calling
Harriet Eudy	HE-3	PSC Decisions Relating to ALLTEL EAS Proceedings
Harriet Eudy	HE-4	Community of Interest Studies
Harriet Eudy	*HE-5	Updated Traffic Studies
Harriet Eudy	*HE-6	Response to Staff's First Set of Interrogatories

* Not mentioned in prefiled testimony, since finalized subsequent to preparation of prefiled testimony.

DOCUMENT NUMBER-DATE

05537 JUN -3 1991

PSC-RECORDS/REPORTING

(c) Basic position:

If the Commission considers the Gilchrist County EAS request under the same criteria as previous EAS proceedings in which ALLTEL has been involved, the Commission will find that a "community of interest" standard is not met. No EAS plan should be implemented on any route in Gilchrist County. If an EAS plan is implemented, full cost recovery should be permitted,

(d), (e), (f), (g) Statement of and positions on questions of law, fact and policy:

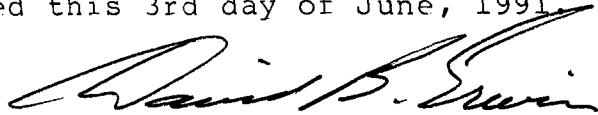
See attached Statement of Position.

(h) ALLTEL is not aware of any issues that have been stipulated.

(i) There are no pending motions or other matters to be acted on prior to hearing.

(j) There are no requirements in the prehearing order with which ALLTEL can not comply.

Respectfully submitted this 3rd day of June, 1991



David B. Erwin
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1311-A Paul Russell Road
Tallahassee, FL 32301

Attorney for ALLTEL Florida,
Inc.

POSITIONS OF
ALLTEL FLORIDA, INC.

Docket No. 870790-TL

1. What factors should be considered when determining whether a community of interest exists in Gilchrist County?

Position: Calling rates (numerical); reliance by one exchange on another for employment, higher education, shopping, medical services and social events should be considered.

2. Is there a sufficient community of interest on the toll routes in Gilchrist County to justify implementing either EAS as currently defined in the Commission rules, or some alternative toll proposal?

Position: No

3. Should any proposed EAS plan or toll alternative plan serve only the Gilchrist County pockets of the involved exchanges, or the entire exchanges?

Position: The entire exchanges.

4. What EAS plan or toll alternative plan, if any, should be implemented on the Gilchrist County routes? Should the same plan be implemented in both directions; be optional or nonoptional; be one-way or two-way?

Position: No EAS plan or toll alternative plan should be implemented.

5. What are the specific cost items that should be considered in determining the proper costs of the implementation of EAS? Should the plan the Commission implements permit full recovery of costs and lost revenues, including incremental costs?

Position: Any plan should permit full recovery of costs and lost revenues and should include the cost to add equipment to provide EAS (incremental cost), lease expense or compensation expense paid to another company, system programming (and other "start up") costs, directory publishing expense, directory assistance expense, lost toll/access revenues.

6. What are the appropriate rates and charges for the plan to be implemented on this route?

Position: Since ALLTEL does not believe that any plan is appropriate in Gilchrist County, ALLTEL has not established any rates and charges for particular plans.

7. Should the customers be surveyed and if so, how should the survey be conducted? If surveyed customers fail to accept the plan presented to them, what alternative, if any, should be considered?

Position: Customers should not be surveyed on any plan and no EAS alternative should be considered.

8. If the Commission orders EAS or a toll alternative whereby ALLTEL and Southern Bell do not equally recover costs and lost revenues, should some form of compensation agreement be established between the two companies?

Position: Yes

9. Can the Commission legally waive its own rules pertaining to EAS (LEGAL ISSUE)

Position: No.

10. If the answer to Issue 9 is "yes," then which rules, if any, should be waived and in what manner and to what extent?

Position: Not applicable.

CERTIFICATE OF SERVICE

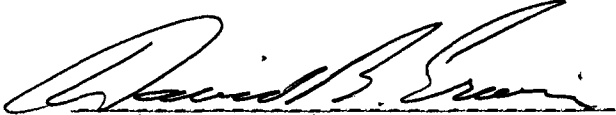
I HEREBY CERTIFY that the foregoing has been furnished by United States Mail this 3rd day of June, 1991, to the following:

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