

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

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

DOCKET NO. 870790-TL

FILED: 06/03/91

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. 24257, the Staff of the Florida Public Service Commission files its Prehearing Statement.

- A. All Known Witnesses: Staff does not intend to sponsor a witness at this time.
- B. All Known Exhibits: Staff has not yet identified a tentative list of exhibits which it intends to utilize in this proceeding. Staff will supply a tentative list of such exhibits at or prior to the Prehearing Conference.
- C. Staff's Statement of Basic Position: Where a sufficient community of interest is determined to exist subscribers should be offered EAS or some other toll alternative plan.

D.-G. Staff's Position on the Issues:

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

STAFF'S POSITION: Factors to be considered when determining whether a community of interest exists in Gilchrist County include, but are not limited to:

- (a) the calling rate between exchanges
- (b) call distributions between exchanges
- (c) access to emergency services
- (d) access to public schools and other educational facilities
- (e) access to medical services, doctors, hospitals
- (f) access to shopping facilities
- (g) access to county government
- (h) access to state government offices located in Gilchrist County
- (i) access to principal employers

ACK _____
 AFA _____
 APP _____
 CAF _____
 CMU _____
 CTR _____
 EAG _____
 LEG _____
 LIN 6 _____
 OFO _____
 ROH _____
 SEC 1 _____
 WAS _____
 OTH _____

DOCUMENT NUMBER-DATE

05546 JUN -3 1991

30-RECORDS/REPORTING

ISSUE 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?

STAFF'S POSITION: Determination of a sufficient community of interest is dependent upon discovery and evidence to be submitted during the hearing. Staff believes that if a sufficient community of interest is found to exist, that EAS or some other toll alternative plan should be implemented.

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

STAFF'S POSITION: Any proposed EAS plan or toll alternative plan should serve the entire exchanges.

ISSUE 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?

STAFF'S POSITION: Determination of a specific EAS plan or toll alternative plan is dependent upon discovery and evidence to be submitted during the hearing.

ISSUE 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?

STAFF'S POSITION: The specific cost items to be considered, include, but are not limited to:

- (a) lost LEC MTS revenue
- (b) lost FX revenue
- (c) lost access charges (originating and/or terminating)
- (d) additional facilities costs (switching and trunking)
- (e) directory costs

Any costs savings, such as the following, should also be taken into account:

- (a) operator savings
- (b) toll billing savings
- (c) access charge savings (originating and/or terminating)

Full cost recovery, in accordance with Rule 25-4.062, F.A.C., should be permitted, unless a showing is made that full cost recovery would be unduly burdensome to the affected subscribers.

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

STAFF'S POSITION: Determination of the appropriate rates and charges for any EAS or toll alternative plan to be implemented in Gilchrist County is dependent upon discovery and evidence to be submitted during the hearing.

ISSUE 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?

STAFF'S POSITION: If traditional flat rate EAS is recommended, then customers should be surveyed according to Rule 25-4.063, F.A.C. If surveyed customers fail to accept the plan presented to them, they should be offered an alternative which is dependent upon discovery and evidence to be submitted during the hearing.

ISSUE 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?

STAFF'S POSITION: No. Compensation agreements are not appropriate in the context of EAS.

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

STAFF'S POSITION: Staff's preliminary position is that these rules can be waived. Staff's final position, however, is dependent upon submission and analysis of the parties' post-hearing briefs.

ISSUE 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?

STAFF'S POSITION: The specific rules to be waived, and the manner and extent to which they should be waived, are dependent upon discovery and evidence to be submitted during the hearing.

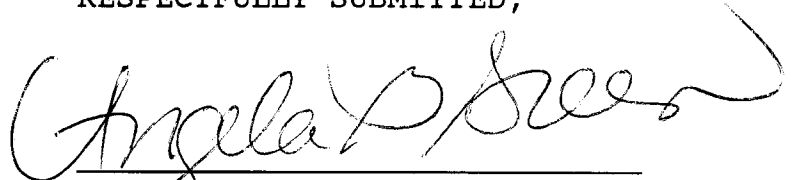
H. Stipulation

Staff is not aware of any issues that have been stipulated at this time.

I. Pending Motions:

Staff has no pending motions at this time.

RESPECTFULLY SUBMITTED,



ANGELA B. GREEN
Staff Counsel

Florida Public Service Commission
101 E. Gaines Street
Tallahassee, Florida 32399-0863
(904) 487-2740

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Extended Area Service) DOCKET NO. 870790-TL
(EAS) throughout Gilchrist County) FILED: 06/03/91
_____)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of STAFF'S PREHEARING STATEMENT has been furnished by U.S. Mail this 3rd day of June, 1991, to the following parties of record:

David Erwin
Mason, Erwin & Horton, P.A.
1311-A Paul Russell Rd.
Suite 101
Tallahassee, FL 32301

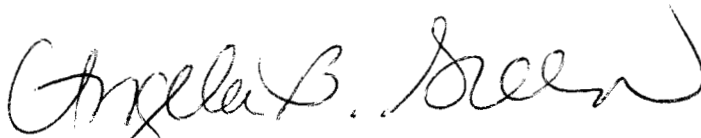
Michael W. Tye
AT&T Communications
106 East College Ave.
Suite 1410
Tallahassee, FL 32301

Harris R. Anthony
E. Barlow Keener
c/o Marshall M. Criser III
150 So. Monroe Street
Suite 400
Tallahassee, FL 32301

Gilchrist County
Board of County Commissioners
Attn: Mitzi Austin
P.O. Box 37
Trenton, FL 32693

Theodore M. Burt
Burt and Lancaster
P.O. Box 308
Trenton, FL 32693

Richard H. Brashear
ALLTEL Florida, Inc.
P.O. Box 550
Live Oak, FL 32060



ANGELA B. GREEN
Staff Counsel
FLORIDA PUBLIC SERVICE COMMISSION
101 East Gaines Street
Tallahassee, FL 32399-0863
(904) 487-2740