



**GTE Florida
Incorporated**

One Tampa City Center
Post Office Box 110, MC 7
Tampa, Florida 33601-0110
(813) 224-4001
(813) 228-5257 (Facsimile)

James V. Carideo
Area Vice President - General Counsel

Attorneys
Lorin H. Albeck
Franklin H. Deak
Joe W. Foster
Wayne L. Goodrum
Thomas R. Parker
Leslie Reicin Stein

**ORIGINAL
FILE COPY**

October 4, 1991

Mr. Steve C. Tribble, Director
Division of Records & Reporting
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32399-0865

Dear Mr. Tribble:

Re: Docket No. 910060-TP
Amendment of Rule 25-4.110, F.A.C.,
pertaining to customer billing

ACK Please find enclosed the original and 15 copies of GTE
Florida Incorporated's Comments for filing in the above
stated matter.

AFA _____
APP Service has been made as indicated on the attached Certifi-
cate of Service. If there are any questions with regard to
CAF _____ this matter, please contact the undersigned at (813) 228-
CMU 2 3087.

CTR _____
EAG _____ Very truly yours,

LEG _____
LIN 6 *Kimberly Caswell*
Kimberly Caswell

OPC _____
RCH 1 KC:fm
Enclosures

SEC 1
WAS RECEIVED & FILED

OTH _____
[Signature]
FPSC-BUREAU OF RECORDS

GTE Florida Incorporated
GTE South Incorporated
A part of GTE Corporation

DOCUMENT NUMBER-DATE

09895 OCT -4 1991

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Amendment of Rule 25-4.110,)
F.A.C., Pertaining to Customer)
Billing.)
_____)

Docket No. 910060-TP
Filed: 10-4-91

COMMENTS AND REQUEST FOR HEARING
OF GTE FLORIDA INCORPORATED

These comments of GTE Florida Incorporated ("GTEFL" or "Company") are submitted in response to the proposed rules under review in this second phase of the above-referenced proceeding. In addition, GTEFL hereby requests a hearing in this matter, pursuant to the September 12, 1991 Notice of Rulemaking issued in this docket.

I. Introduction

GTEFL recognizes that certain pay-per-call service providers engage in anti-consumer practices and fully supports appropriate efforts to curb these abuses. The Company is committed to taking reasonable steps to reduce the likelihood of consumer fraud. In fact, many of the proposed rules are consistent with current GTEFL practices and policies. In some instances, however, the Company believes that clarification is warranted as to the proper scope of responsibility of the local exchange carrier ("LEC").

In addition, as GTEFL explained in its comments in Phase I, efforts are underway to implement a new and more sophisticated billing system across all GTE operating companies. Because of GTEFL's conversion to the improved billing system, additional expenditures of time or money on the old system would be imprudent. Under these circumstances, the Company assumes that the Commission

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would not take any action requiring modification of the current system, now being phased out. These comments reflect this assumption. Where a proposed rule would require billing system changes, GTEFL will discuss those changes in terms of the new system. In any case, GTEFL again stresses the complex nature of LEC billing system alterations, such that a reasonable transition period would be necessary before implementation of certain safeguards, if adopted.

These points are developed more fully below in the Company's responses to each numbered section of the proposed rules.¹

II. Analysis

25-4.110(9) Each local exchange company shall apply partial payment of an end user/customer bill towards satisfying any unpaid regulated charges. The remaining portion of the payment (if any) shall be applied to nonregulated charges.

GTEFL's billing system does not currently have the capacity to apply payments in the manner specified in the proposal. While this feature can probably be developed, the Company expects that the process would take approximately 24 months. GTEFL believes, however, that the resources needed to do so would be more efficiently directed elsewhere. To the extent that this proposal derives from concern that customers will be disconnected for non-

¹ As the Commission knows, on September 26 the FCC adopted rules in its Docket No. 91-65, concerning the provision of interstate pay-per-call services. Because the order in that proceeding has not yet been issued, GTEFL is unable to comment upon the effects of the federal action on state regulation of these services.

payment of unregulated charges, GTEFL believes it to be unnecessary. GTEFL's tariff, like that of other LECs, already forbids knowing disconnection of local service for failure to pay unregulated charges. Duplicative safeguards, such as the proposed rule, undermine the goal of efficient operation.

25-4.110(10) This section applies to local exchange companies and interexchange carriers that provide transmission services and/or bill and collect on behalf of Pay Per Call providers. Pay Per Call services are defined as switched telecommunications services between locations within the State of Florida which permit communications between an end use customer and an information provider's program at a per call charge to the end user/customer. Pay Per Call services include 976 Services provided by the local exchange companies and 900 services provided by interexchange carriers.

This prefatory language to the specific safeguards of the rule correctly reflects that attempts to halt 900/976 abuses will require a sharing of responsibility between LECs and interexchange carriers ("IXCs"). However, in certain instances, the proposed rules do not clearly delineate their respective spheres of responsibility. Moreover, they do not adequately recognize that an effective and equitable scheme of protections cannot focus solely on the LECs and IXCs. Other entities -- chiefly, the information providers ("IPs") themselves must be given primary accountability. GTEFL believes customers must also be expected to monitor their own actions to a reasonable degree. The Company will further discuss these concepts in the context of its comments on specific subsections of this rule.

25-4.110(10)(a) Charges for Pay Per Call service (900 or 976) shall be segregated from charges for regular long distance or local charges appearing separately under a heading that reads as follows: "Pay Per Call (900 or 976) nonregulated charges". The following information shall be clearly and conspicuously disclosed on each section of the bill containing Pay Per Call service (900 or 976) charges:

1. Non payment of Pay Per Call service (900 or 976) charges will not result in disconnection of local service;
2. End users/customers can obtain free blocking of Pay Per Call service (900 or 976) from the local exchange telephone company;
3. The local or toll-free number the end user/customer can call to dispute charges;
4. With 900 service, the name of the interexchange carrier providing 900 service; and
5. The Pay Per Call service (900 or 976) program name.

This provision requires segregation of pay-per-call charges from other types of charges. GTEFL is committed to effecting the necessary modifications to enable such segregation as quickly as possible, and has already initiated the process. However, as GTEFL explained in its comments in Phase I, implementation of this capability in the Company's new billing system will not be completed until at least March of 1992. Until then, the Company cannot print the disclosure messages exactly as specified in the proposed rule. In the interim, GTEFL can accommodate the requirements to some degree by presenting a five line bill message phrase on the summary page of the bill. See GTEFL Phase I Comments, at 3.

Finally, the Company wishes to clarify that GTEFL's contact number for disputed charges relative to 976 services and 900 services for which it performs inquiry appears on the first page of the GTEFL section of the bill. The 900 inquiry number for IXCs for which GTEFL does not do inquiry is included in the IXC section of the bill. The Company believes this practice fully complies with the subsection 3 of this proposed rule.

25-4.110(10)(b) Pay Per Call Service (900 and 976) Billing. Local exchange companies and interexchange carriers who have a tariff or contractual relationship with a Pay Per Call (900 or 976) provider shall not provide Pay Per Call transmission service and/or billing services, unless the provider does each of the following:

As a point of clarification, GTEFL has no tariff or contractual relationship with providers of 900 services. In these cases, GTEFL contracts with the IXC which provides the transmission for these services. The Company thus construes all subsections of Section 25-4.110(10)(b) to impose responsibility on the LEC only with regard to 976 services travelling over its network.

In addition, GTEFL does not understand the following requirements to place LECs in a position of watchdog of the pay-per-call industry. The proposed rules address various aspects of the content of IP messages and advertising. GTEFL agrees that the LECs may have some ability to ensure IP compliance with these standards through its billing contract stipulations and policy guidelines. GTEFL will terminate its relationship with an IP which violates these requirements, and will also take action upon customer complaints about providers. However, it is not appropriate or

feasible to expect carriers to independently police IP programs and promotions. Primary accountability for content of these materials properly rests with the IP itself.

25-4.110(b)(1) Provides an 18 second or longer preamble to the program which states the total minimum charge for the Pay Per Call service (900 and 976); child's parental notification requirement is announced on all preambles for all programs; child's parental notification requirement in any preamble to a program targeted to children must be in language easily understandable to children; programs that do not exceed \$3.00 in total charges may omit the preamble, and the program may allow an end user/customer to affirmatively bypass a preamble.

Certain aspects of this rule, if adopted, would present technical difficulties for GTEFL. The rule would forbid carriers to bill when a message does not include "an 18 second or longer preamble." GTEFL's billing system would thus need to be programmed to avoid rating calls that last less than the duration of the preamble. This modification, however, will not be possible if preambles vary in length. The system has no ability to determine when the preamble has ended; rather, it must be specifically defined. In addition, GTEFL estimates that it will take at least 24 months to perform the programming changes necessary to test whether calls exceed a specifically defined preamble period or that fall within the \$3.00 maximum charge preamble exemption.

Aside from these technical matters, GTEFL believes this section's requirements with respect to children's programs will create more problems than they solve. The rule, as currently written, would require children's parental notification on all preambles for all programs. Such notification would tend to make

the caller believe that a particular program is, indeed, targeted to children -- even if it is a stock quote. In addition, the directive that preambles on children's programs "must be in language easily understandable to children" duplicates the same requirement in proposed subsection (10)(b)(3), below. The Company believes that notification is warranted only for children's programs, and that all of the child-specific guidelines should appear just in subsection (3), below, to prevent confusion.

25-4.110(10)(b)(2) Provides the end user/customer the ability to disconnect the call during or at the conclusion of the preamble without incurring a charge;

GTEFL's initial criticism of this requirement focuses on an internal, logical incongruity. The introductory language to § 25-4.110(10)(b) forbids LECs and IXC's to provide transmission and/or billing unless "the provider" complies with each of a number of specified items, including the disconnection requirement quoted immediately above. This framing of the rule thus does not accurately reflect the way in which 900/976 services are furnished and billed. The IP, or "provider", cannot provide the end user the ability to avoid incurring a charge if he disconnects within the specified period. Only the entity performing the call rating functions (i.e., either the LEC or IXC) can determine whether a call will ultimately be billed. The rule's language should be altered in accordance with this fact.

Since IPs do not control the process that produces billing records, GTEFL understands this section to place an affirmative

obligation on LECs and IXC's to suppress billing records where a subscriber hangs up within the preamble period. This subsection again contemplates a variable length preamble. As set forth in the comments regarding subsection 1, above, this concept fails to recognize billing system limitations. GTEFL cannot treat each call differently for billing purposes.

With regard to 900 services for which GTEFL bills, in most cases, it is the IXC's responsibility to screen its call detail to avoid passing records to GTEFL for calls terminated before conclusion of the preamble. Only in those cases where the Company performs rating for the IXC can GTEFL control which 900 calls will be billed.

25-4.110(10)(b)(3) Provides on each program promotion targeted at children (defined as 17 years and younger) clear and conspicuous notification, in language understandable to children, of the requirement to obtain parental permission before placing or continuing with the call. The parental consent notification shall appear prominently in all advertising and promotional materials, and in the program preamble. Children's programs shall not have rates in excess of \$5.00 per call, and shall not include the enticement of a gift or premium.

As GTEFL pointed out earlier, this section's requirement of a parental consent notification within the program is redundant with the preamble notification requirement of subsection 1 of this same section. Including essentially the same requirement in two different sections is confusing and inconsistent with sound principles of statutory drafting. GTEFL believes the parental consent requirement should be included only in this subsection, and applied just to programs targeted to children. Further, some

clarification is needed with respect to the inclusion of preambles on children's programs. This section seems to require a preamble on all programs targeted to children, while proposed §25-4.110 (b)(1) would permit omission of a preamble for programs that do not exceed \$3.00 in total charges.

While GTEFL fully supports the intent of this section, the Company believes its own, existing guidelines adequately address the abuses arising in conjunction with children's programs. As part of its billing contracts, GTEFL today requires that 976 programs comply with a comprehensive set of strict safeguards. For instance, the Company already requires that all advertisements for programs targeted at children contain an advisory that parents' permission must be obtained before calling the program. Callers must not be advised to call back again, and cross-advertising of one children's program on another is prohibited. Acceptable print size for advertisements in both print and video is explicitly set forth. When a program is submitted to GTEFL, copies of associated advertising in all media are also submitted. This is a continuing requirement, such that any changes in advertising over the life of the program should also come to the Company's attention.

If GTEFL becomes aware of potential violations of its guidelines -- through a customer complaint or otherwise -- it will investigate and contact the IP or the IXC. The remedy for refusal of an IP to comply with GTEFL's standards is termination of that entity's contract.

25-4.110(10)(b)(4) Promotes its services without the use of an autodialer or broadcasting of tones that dial a Pay Per Call (900 and 976) number;

As currently written, the section contains an affirmative promotion requirement, which GTEFL believes to be unintended. GTEFL submits that this section would be better worded as follows:

24-3.110(10)(b)(4) Refrains from promoting its service through use of an autodialer or broadcasting of tones that dial a pay-per-call number.

As a substantive matter, GTEFL does not object to this requirement. Since the Company's advertising guidelines require advance submission of all forms of advertising, it should become aware of IPs' intentions to advertise by means of an autodialer or tone generator. GTEFL would only point out that the autodialer prohibition appears redundant with already existing law. Fla. Stat. §365.1657 forbids the use of autodialers to transmit unsolicited advertising for the sale of any goods or services. Pay-per-call programs would presumably fit within this provision.

25-4.110(10)(b)(5) Prominently discloses the additional cost per minute or per call for any other telephone number that an end user/customer is referred to either directly or indirectly;

GTEFL understands this section to address all types of referrals, including cross-advertising. As GTEFL pointed out above, these practices are not permitted in conjunction with children's 976 services for which the LEC provides transmission. While such referrals are permitted for adult services, GTEFL's

current guidelines are consistent with the proposed rule's disclosure requirements.

25-4.110(10)(b)(6) Discloses clearly and conspicuously in all advertising and promotional materials the name of the information provider or sponsor and all charges for Pay Per Call services, displayed in the same print size as the Pay Per Call number;

GTEFL fully supports adequate disclosure of information about pay-per-call services. To this end, GTEFL already requires the clear and conspicuous display of this data, setting forth, for example the number of lines an advertisement must take up on a television screen. The Company believes that these internal guidelines are superior to mandating that the telephone number, charges, and provider's name all appear in the same size. The Company's approach protects against abuse while ensuring sufficient flexibility to address the particular characteristics of diverse media.

25-4.110(10)(b)(7) Provides on Pay Per Call services that involve sales of products or merchandise clear preamble notification of the price that will be incurred if the end user/customer stays on the line, and a local or toll free number for consumer complaints;

Under current policy, GTEFL will not accept 976 programs involving the sale of products or merchandise. The Company believes this practice to be consistent with the proposed rule, which is less restrictive.

25-4.110(10)(b)(8) Meets internal standards established by the local exchange company or the interexchange carrier as defined in the applicable tariffs or contractual agreement between the LEC and the IXC; or between the LEC/IXC and the Pay Per Call (900 or 976) provider which when violated, would result in the termination of a transmission and/or billing arrangement.

GTEFL fully supports this proposal. As discussed throughout this filing, the Company has already established comprehensive internal guidelines to prevent pay-per-call abuses. This subsection confirms the LEC's right to maintain these standards, which are in several respects more stringent than those mandated by the Commission.

25-4.110(10)(c) Pay Per Call (900 and 976) Blocking. Each local exchange company shall provide blocking (where technically feasible) of Pay Per Call service (900 and 976), at the request of the end user/customer at no charge. Each local exchange company or interexchange carrier must implement a bill adjustment tracking system to aid its efforts in adjusting and sustaining Pay Per Call charges. The carrier will adjust the first bill containing Pay Per Call charges upon the end user's/customer's stated lack of knowledge that Pay Per Call service (900 and 976) has a charge. At the time the charge is removed, the end user/customer may agree to free blocking of Pay Per Call service (900 and 976).

Currently, GTEFL's tariff authorizes a non-recurring \$10.00 charge for blocking. This charge, however, is waived in all cases in which GTEFL institutes mandatory blocking. The Company believes this approach satisfies concerns about consumer fraud, without unduly compromising its ability to cover the costs of providing the blocking service.

A bill adjustment tracking system is already in place to document all communications with each customer regarding any bill

inquiries, including those relative to 976 and 900 services. The information is entered on a permanent field within each customer's account record.

25-4.110(10)(10)(d) Dispute resolution for Pay Per Call service (900 and 976). Charges for Pay Per Call service (900 and 976) shall be automatically adjusted upon complaint that:

1. The end user/customer did not receive a price advertisement, the price of the call was misrepresented to the consumer, or the price advertisement received by the consumer was false, misleading, or deceptive;
2. The end user/customer was misled, deceived, or confused by the Pay Per Call (900 or 976) advertisement;
3. The Pay Per Call (900 or 976) program was incomplete, garbled, or of such quality as to render it inaudible or unintelligible, or the end user/customer was disconnected or cut off from the service;
4. The Pay Per Call (900 and/or 976) service provided out-of-date information;
5. The end user/customer terminated the call during the eighteen (18) second preamble described in 25-4.110 (10) (b) (1), but was charged for the Pay Per Call service (900 or 976).

GTEFL believes its adjustment policy is at least as generous as this proposed scheme. With regard to 976 services and 900 services for which GTEFL does inquiry, the Company will grant a first time adjustment for any valid reason. In subsequent instances, GTEFL will still adjust the charges if the customer offers a plausible explanation.

25-4.110(10)(e) If the end user/customer refuses to pay a disputed Pay Per Call service (900 or 976) charge which is subsequently determined by the LEC to be valid, the LEC or IXC may implement Pay Per Call (900 or 976) blocking on that line.

This section correctly recognizes subscribers' responsibility to pay legitimate 900 and 976 charges. In some instances, mandatory blocking is the only way to enforce providers' rights to obtain payment for services rendered. GTEFL agrees that carriers should be permitted broad authority to implement blocking if they discover a customer refuses to pay legitimate charges. The Company interprets this section to allow blocking even upon the first dispute if abuse by the customer is apparent at that time.

25-4.110(10)(f) Credit and Collection. Local exchange companies and interexchange carriers billing Pay Per Call (900 and 976) charges to an end user/customer in Florida shall not:

1. Collect or attempt to collect Pay Per Call service (900 or 976) charges which are being disputed or which have been removed from an end user's/customer's bill;
2. Report the end user/customer to a credit bureau or collection agency for non-payment of Pay Per Call (900 or 976) charges.

In accordance with current Company policy, GTEFL does not attempt to collect disputed pay-per-call charges. The Company therefore has no objection to adoption of subsection 1 of this rule. It believes, however, that subsection 2 is unjustified. That section, as currently written, would prevent referral of a subscriber's account to a collection agency even where it is clear the subscriber has been abusive and has no intention of paying for

services he has knowingly requested and received. The intent of this requirement is not clear. Disconnection of local service cannot be the danger addressed, since termination will not occur even where a customer has refused to pay legitimate 900 or 976 charges. It is simply unfair to absolve the customer of responsibility to pay validly issued charges. It is, moreover, inconsistent with the thrust of §10(e), which correctly recognizes this duty through initiation of mandatory blocking.

25-4.110(10)(g) Local exchange companies and interexchange carriers billing Pay Per Call service (900 and 976) charges to end users/customers in Florida shall implement safeguards to prevent the disconnection of phone service for non-payment of Pay Per Call (900 or 976) charges.

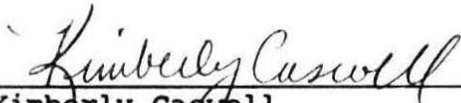
GTEFL does not object to adoption of this section. As stated earlier, Company practices already forbid local service termination for non-payment of pay-per-call charges. Under these procedures, no customer has been disconnected for delinquent 900 or 976 charges.

III. Conclusion

GTE Florida is committed to doing its part to halt abuses by pay-per-call providers. To this end, it has already established policies and practices that conform to many of the proposed rules. In some cases, however, technical constraints would prevent GTEFL from immediately complying with certain rules, if adopted. A reasonable transition period will be necessary to modify the billing system, an inherently complex and protracted process.

Finally, GTEFL urges the Commission to accept its recommendations herein as to fine-tuning and clarification of particular rule sections.

Respectfully submitted this 4th day of October, 1991.



Kimberly Caswell
Thomas R. Parker
GTE Florida Incorporated
P.O. Box 110 MC 7
Tampa, FL 33601
813/228-3094
813/228-3087

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of GTE Florida Incorporated's Comments in Docket No. 910060-TP has been furnished by U.S. mail on the 4th day of October, 1991, to the parties on the attached list.



Kimberly Caswell

Ann Shelfer
Div. of Communications
Fla. Public Svc. Com.
101 E. Gaines St. #212
Tallahassee, FL 32399-
0861

Lynn Hall
Vista-United Telecom.
P.O. Box 10180
Lake Buena Vista, FL
32830

Harriet Eudy
ALLTELL Florida Inc.
206 White Av., S.E.
Live Oak, FL 32060

Lily Corbin
Quincy Tel. Co.
P.O. Box 189
Quincy, FL 32351

Ferrin Seay
The Florala Tel. Co.
522 North Fifth St.
Florala, FL 36442

A. Dewayne Lanier
Gulf Tel. Co.
P.O. Box 1120
Perry, FL 32347

Thomas E. Wolfe
Southland Tel. Co.
201 S. Pensacola Ave.
Atmore, AL 36504

Charles L. Dennis
Indiantown Tel.
15925 S.W. Warfield Blvd.
Indiantown, FL 34956

Howard Levin
Interactive TeleMedia
14651 Ventura Blvd #300
Sherman Oaks, CA 91403

Linda Goldstein
Hall Dickler Lawler
Kent & Friedman
11 Martine Ave.
White Plains, NY 10606

David Ryder
Ryder Communications, Inc.
3111 University Dr. #406
Coral Springs, FL 33065

Barry Goldstein
125 Moccasin Trail So.
Jupiter, FL 33458

Judith Grytdahl
The 900 Source
5905 E. 42nd Ave.
Denver, CO 80216-4613

Carol Brennan
Phone Programs
919 Third Ave.
New York, NY 10022

Albert Angel
Fax Interactive, Inc.
3500 Magellan Cir. #717
Aventura, FL 33180

Michael Twomey
Dept. of Legal Svcs.
Attorney Gen.'s Ofc.
The Capital, Su. 1502
Tallahassee, FL 32399-
1050

John Carroll
NorthEast Fla. Tel.Co., Inc.
130 N. Fourth St.
MacClenny, FL 32063-0485

Lynda Bordelon
St. Joseph Tel. & Tel. Co.
502 Fifth Street
Port St. Joe, FL 32456

Frank Levin
Hall Dickler Lawler Kent
& Friedman
460 Park Ave.
New York, NY 10022

Tracy Hatch
Div. of Legal Services
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL
32399-0865

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

Alan N. Berg
Senior Attorney
United Tel Co of Fla
P.O. Box 5000
Altamonte Springs, FL
32716-5000

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

Michael W. Tye
AT&T Communications, Inc.
Suite 1410
106 E. College Avenue
Tallahassee, FL 32301

David Smith
Div. of Legal Svcs.
Florida Public Svc.
Commission
101 East Gaines St.
Tallahassee, FL
32399-0865

Jack Shreve
Charles J. Beck
Office of Public Counsel
& Fla. House of Repre.
111 W. Madison St., Rm. 812
Tallahassee, FL 32399-
1400

Michael J. Henry
MCI Telecommunications Corp.
MCI Center
Three Ravinia Drive
Atlanta, GA 30346-2102

Richard D. Melson
Hopping Boyd Green &
Sams
P.O. Box 6526
Tallahassee, FL 32314

Lee L. Willis
Ausley, McMullen, McGehee,
Carothers & Proctor
P.O. Box 391
Tallahassee, FL 32302

Robert A. Butterworth
Patricia R. Gleason
Attorney General
State of Florida
Dept. of Legal Affairs
The Capitol
Tallahassee, FL 32399-
1050

Joe Gillan
Gillan Associates
P. O. Box 547276
Orlando, FL 32854-
7276

Andrew D. Lipman
Jean L. Kiddoo
Robert G. Berger
Swidler & Berlin
3000 K Street, N.W.
Washington, DC 20007

Nycom Information Svcs.
Attn: Jodi DelVecchio
5 High Ridge Park
Stamford, CT 06905

D. Bruce May
Holland & Knight
P. O. Drawer 810
Tallahassee, FL
32302

Joseph McGlothlin
Lawson McWhirter
Grandoff & Reeves
522 E. Park Avenue
Suite 200
Tallahassee, FL 32301

Patrick Wiggins
Wiggins & Villacorta
P. O. Drawer 1657
Tallahassee, FL 32302

Barry E. Selvidge
Messer Vickers et al.
P. O. Box 1876
Tallahassee, FL 32302
1876

C. Dean Kurtz
Central Tel. Co. of
Florida
P. O. Box 2214
Tallahassee, FL 32316

Craig Dingwall
Helen M. Hall
US Telecom, Inc.
2002 Edmund Halley Dr.
Reston, VA 22091
Mailstop: VARESC106H

Richard Bellak
Associate Gen. Counsel
Division of Appeals
Fla. Public Svc. Com.
101 E. Gaines St. #212
Tallahassee, FL 32309-
0861