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LAW OFFICES

MESSER, VICKERS, CAPARELLO, MADSEN, LEWIS, GOLDMAN & METZ
A PROFESSIONAL ASSOCIATION

SUITE 701, FIRST FLORIDA BANK BUILDING
215 SOUTH MONROE STREET
POST OFFICE BOX 1876
TALLAHASSEE, FLORIDA 32302-1876
TELEPHONE (904) 222-0720
TELECOPIER (904) 224-4359

ORIGINAL
FILE COPY

SUITE 900
2000 PALM BEACH LAKES BOULEVARD
WEST PALM BEACH, FLORIDA 33409
TELEPHONE (407) 640-0820
TELECOPIER (407) 640-8202

REPLY TO: Tallahassee

December 18, 1992

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

HAND DELIVERED

Re: FPSC Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed for filing are an original and fifteen copies of McCaw Cellular Communications of Florida, Inc.'s Prehearing Statement in the above-referenced docket.

Please date stamp the extra copy of this letter enclosed to indicate this filing and return the copy to me. Thank you for your assistance in the processing of this filing, and please call if there are any questions or further requirements.

ACK ✓ Sincerely yours,
AFA 3
APP _____
CAF _____
Floyd R. Self

FRS:sb\tribble.tlt

Enclosures

cc: Parties of Record
Mr. Mike Fannon

CAF 1
CIR _____
EIR _____
LES 1
LIT 6
OFC _____
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Comprehensive Review of the)
Revenue Requirement and Rate)
Stabilization Plan of Southern)
Bell Telephone & Telegraph Company)

Docket No. 920260-TL

Filed: December 18, 1992

**MCCAW CELLULAR COMMUNICATIONS OF FLORIDA, INC.'S
PREHEARING STATEMENT**

McCaw Cellular Communications of Florida, Inc. ("McCaw"), pursuant to Florida Public Service Commission ("Commission") Order No. PSC-92-1195-PCO-TL and Florida Administrative Code Rule 25-22.038(3), respectfully submits the following Prehearing Statement in the above-captioned docket.

A. WITNESSES

McCaw does not intend to present witnesses; however, McCaw reserves the right to call witnesses, if necessary, as may be required by later filed testimony, the completion of discovery, or new issues identified at the prehearing conference.

B. EXHIBITS

McCaw does not intend to present independent exhibits; however, McCaw reserves the right to present exhibits, if necessary, as may be required by later filed testimony, the completion of discovery, or new issues identified at the prehearing conference.

C. BASIC POSITION

McCaw's interest in this proceeding is limited to only a few of the issues identified in the Additional Order on Prehearing Procedure. Specifically, McCaw's interest in this docket is

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FPSO-RECORDS/REPORTING

limited to those issues pertaining to mobile interconnection rates (Issue 34), the review of the rate stabilization plan (Issues 26a and 26b), the proposed price regulation plan (Issues 27, 28, and 29), and some of the cross-subsidy issues (Issues 30a, 30c, and 30d). At this time, McCaw takes no position on all issues and is endeavoring in good faith to review the present pleadings, testimony, and evidence of record to determine if it can take a position on any of the specific issues McCaw has identified in which it may have an interest.

D. ISSUES AND POSITIONS

McCaw presents the following positions on the issues of law, fact, and policy identified in this docket.

ISSUE 1 Is the test year ended December 31, 1991 an appropriate test year?

McCaw has no position at this time.

ISSUE 2 What is the appropriate amount of plant in service for the test year?

McCaw has no position at this time.

ISSUE 2a Have the investments and expenses for video transport service been appropriately identified and accounted for?

McCaw has not position at this time.

ISSUE 2b Is Southern Bell's investment in its interLATA internal company network prudent? If not, what action should the Commission take?

McCaw takes no position at this time.

ISSUE 3 What is the appropriate amount of depreciation reserve for the test year?

McCaw takes no position at this time.

ISSUE 4 What adjustment should be made to the depreciation reserve to reflect new depreciation rates and recovery schedules as approved in Docket No. 920385-TL?

McCaw takes no position at this time.

- ISSUE 5** What is the appropriate amount of construction work in progress for the test year?
- McCaw takes no position at this time.
- ISSUE 6** What is the appropriate amount of property held for future use for the test year?
- McCaw takes no position at this time.
- ISSUE 7** What is the appropriate amount of working capital allowance for the test year?
- McCaw takes no position at this time.
- ISSUE 8** What is the appropriate amount of rate base for the test year?
- McCaw takes no position at this time.
- ISSUE 9** What is the appropriate cost of common equity capital for Southern Bell?
- McCaw takes no position at this time.
- ISSUE 9a** Should there be a penalty imposed for poor quality of service? If so, what should be the penalty?
- McCaw takes no position at this time.
- ISSUE 10** Is Southern Bell's proposed test year equity ratio prudent and reasonable? If not, how should this be treated?
- McCaw takes no position at this time.
- ISSUE 11** Is Southern Bell's balance of accumulated deferred investment tax credits, prior to reconciliation to rate base, appropriate?
- McCaw takes no position at this time.
- ISSUE 12** Is Southern Bell's balance of accumulated deferred taxes, prior to reconciliation to rate base, appropriate?
- McCaw takes no position at this time.
- ISSUE 13** What is the appropriate weighted average cost of capital including the proper components, amounts, and cost rates associated with the capital structure for the test year?
- McCaw takes no position at this time.

ISSUE 14 What is the appropriate amount of operating revenue for the test year?

McCaw takes no position at this time.

ISSUE 14a Are all of the revenues from significant tariff revisions or planned tariff filings appropriately reflected in the test year?

McCaw takes no position at this time.

ISSUE 14b Has the Company accounted for employee concessions appropriately during the test year?

McCaw takes no position at this time.

ISSUE 14c Should an adjustment be made to intrastate revenues for the test period to recognize adjustments to IXC's percentage interstate usage (PIU)?

McCaw takes no position at this time.

ISSUE 14d How often should Southern Bell be required to perform PIU audits?

McCaw takes no position at this time.

ISSUE 14e What is the appropriate amount of directory advertising revenue that should be included in the test period?

McCaw takes no position at this time.

ISSUE 14f Does the Company's uncollectible accounts ratio represent a reasonable and necessary ongoing level?

McCaw takes no position at this time.

ISSUE 15 What is the appropriate amount of O&M expense for the test year?

McCaw takes no position at this time.

ISSUE 15a Are the allocations to non-regulated operations reasonable?

McCaw takes no position at this time.

ISSUE 15b What is the appropriate adjustment to revenue requirements related to BellSouth's reorganization?

McCaw takes no position at this time.

ISSUE 15c What adjustment, if any, should be made to expenses for USTA dues?

McCaw takes no position at this time.

ISSUE 15d Is Southern Bell correctly separating the revenues, expenses and investment in its Line Identification Data Base (LIDB) offering to the appropriate jurisdictions?

McCaw takes no position at this time.

ISSUE 15e Is the amount of lobbying and other political expenses included in the Company's intrastate operating expenses appropriate for ratemaking purposes?

McCaw takes no position at this time.

ISSUE 15f Is the amount of advertising and public relations expenses included in the Company's intrastate operating expenses appropriate for ratemaking purposes?

McCaw takes no position at this time.

ISSUE 15g Has the Company properly employed an appropriate expense/capitalization ratio for compensation?

McCaw takes no position at this time.

ISSUE 15h Does the level of legal, injury and damage claims expense represent a reasonable and necessary ongoing level?

McCaw takes no position at this time.

ISSUE 15i What is the appropriate treatment of the Company's promotional and charitable contributions?

McCaw takes no position at this time.

ISSUE 15j Are the test year expenses for software reasonable?

McCaw takes no position at this time.

ISSUE 15k How should software additions be treated for ratemaking purposes?

McCaw takes no position at this time.

ISSUE 15l How should the Commission treat the Company's incentive compensation/bonus plan payments?

McCaw takes no position at this time.

ISSUE 15m Are employee benefits expenses reasonable and based on known and measurable events?

McCaw takes no position at this time.

ISSUE 15n How should the Commission treat the Company's abandoned projects?

McCaw takes no position at this time.

ISSUE 15o Should ratepayers receive credit for pension collections not funded or paid into the pension plan?

McCaw takes no position at this time.

ISSUE 15p How should overfunded pension amounts be treated?

McCaw takes no position at this time.

ISSUE 16 Have non-recurring items been removed from the determination of revenue requirements?

McCaw takes no position at this time.

ISSUE 16a Does the level of employee relocation expenses represent a reasonable and necessary ongoing level?

McCaw takes no position at this time.

ISSUE 16b How should the Commission treat the expenses included in the test year related to early retirement?

McCaw takes no position at this time.

ISSUE 17 Are the affiliated charges and overhead allocations to Southern Bell-Florida reasonable, including charges from the central management/service organization?

McCaw takes no position at this time.

ISSUE 17a Are the ownership costs incurred at the corporate level appropriate for ratepayers to pay?

McCaw takes no position at this time.

ISSUE 17b How should the Commission treat the expenses incurred by BellSouth for supplemental executive retirement, stock appreciation rights and incentive compensation?

McCaw takes no position at this time.

ISSUE 17c Are the regulated operations being properly compensated for billing and collection services provided to nonaffiliated companies, and nonregulated and/or affiliated company operations?

McCaw takes no position at this time.

ISSUE 17d How should the Commission treat BST Research Organization expenses?

McCaw takes no position at this time.

ISSUE 17e Do Southern Bell's intrastate expenses include Bellcore and BellSouth Services allocated research and development costs which are of no tangible benefit to ratepayers? If so, what adjustment should be made?

McCaw takes no position at this time.

ISSUE 17f Do Southern Bell's expenditures for Bellcore services cause ratepayers of regulated telephone services to pay inappropriately for future, potentially non-regulated BellSouth products and services? If so, what adjustment should be made?

McCaw takes no position at this time.

ISSUE 17g Are the rental costs incurred by BellSouth Corporation Headquarters and allocated to Southern Bell-Florida reasonable?

McCaw takes no position at this time.

ISSUE 18 What is the appropriate amount of expense for postretirement benefits other than pensions for the test year?

McCaw takes no position at this time.

ISSUE 19 What is the appropriate amount of depreciation expense for the test year?

McCaw takes no position at this time.

ISSUE 19a What adjustment should be made to depreciation expense to reflect the new depreciation rates and recovery schedules as approved in Docket No. 920385-TL?

McCaw takes no position at this time.

ISSUE 20 What is the appropriate amount of taxes other than income for the test year?

McCaw takes no position at this time.

ISSUE 21 What is the appropriate amount of income tax expense for the test year?

McCaw takes no position at this time.

ISSUE 21a How should the effect of implementing SFAS 109, Accounting for Income Taxes, be treated by the Commission?

McCaw takes no position at this time.

ISSUE 21b How should the unprotected excess deferred income taxes be amortized?

McCaw takes no position at this time.

ISSUE 22 Should consolidated tax savings be recognized for ratemaking?

McCaw takes no position at this time.

ISSUE 23 What is the appropriate achieved test year net operating income?

McCaw takes no position at this time.

ISSUE 24 Is Southern Bell's attrition (accretion) allowance appropriate?

McCaw takes no position at this time.

ISSUE 25 What is the appropriate amount of revenue increase/decrease for the test year?

McCaw takes no position at this time.

ISSUE 25a Did Southern Bell earn above 14% Return on Equity (ROE) for 1991 therefore requiring a sharing of earnings between the company and ratepayers per Order No. 20162? If so, what is the amount to be shared?

McCaw takes no position at this time.

ISSUE 25b Did Southern Bell experience an increase in earnings when netting rate changes against changes in earnings due to exogenous factors and debt refinancings, therefore requiring a refund and/or a permanent disposition for 1991 per Order No. 20162? If so, what is the amount?

McCaw takes no position at this time.

ISSUE 25c What amount of revenue is subject to disposition in 1993 due to orders issued in DN 880069?

McCaw takes no position at this time.

ISSUE 25d What amount of revenue, if any, should be refunded?

McCaw takes no position at this time.

ISSUE 25e Should Southern Bell be required to file, within 30 days after the date of the final order in this docket, an updated schedule to reflect the actual rate case expense?

McCaw takes no position at this time.

ISSUE 26a What criteria should the Commission use to evaluate Southern Bell's performance under, and its proposal for, an incentive regulation, price cap or price regulation plan? (For example, data provided in MFR Schedules on expenses, productivity, efficiency, comparisons of that or other data with other LECs, etc.)

McCaw takes no position at this time.

ISSUE 26b Has the current incentive regulation plan under which Southern Bell has been operating achieved the goals as set forth in DN 880069-TL? What are the positive and negative results, if any?

McCaw takes no position at this time.

ISSUE 27 Southern Bell (SBT) proposes to change its current form of regulation. The proposed plan includes the following components listed below. On the basis of these components, what are the pros and cons of this plan?

- A. Places ceiling on aggregate prices via a Price Regulation Index (PRI). This index is composed of an inflation measure, less a productivity factor offset, plus or minus any exogenous factors.
- B. For inflation, PRI uses the Gross National Product-Price Index (GNP-PI).
- C. PRI Productivity offset set at 4%.
- D. Defines exogenous factors as those measurable expenses beyond SBT's control. This includes changes in regulations or statutes, taxes, separations, and accounting practices, and adjustments to depreciation rates.
- E. PRI initially indexed at 100 as the starting point.
- F. PRI is adjusted annually and aggregate prices are then adjusted accordingly. Downward adjustments are required, upward adjustments are optional. First adjustment is in 1994.
- G. Any changes in aggregate prices during the year must be below or at the PRI of 100.
- H. Regulated services with no tariffed rates are excluded from the PRI.

- I. Contract Service Arrangement prices are excluded from PRI.
- J. New service prices excluded from PRI for at least 12 months.
- K. Restructured services are placed in the PRI upon filing.
- L. PRI to be recalculated annually. Price changes required to bring average prices at or below the PRI would be filed in associated tariffs in an annual May 1 filing and would go into effect 60 days later.
- M. Proposes two categories of services, basic and non-basic services.
- N. Defines basic services as those services generally required to provide essential local exchange services to an end user as well as access to providers of basic local services and toll service.
- O. Defines Non-Basic services as those tariffed services not in the basic category. Includes those that are optional or can be provided by a vendor other than SBT.
- P. Installs pricing rules for each category.
 - 1. For basic services:
 - Sets limit on service category increases at 5%.
 - Individual service prices could be raised a maximum of 5% annually, as long as the average for all prices did not exceed the PCI.
 - No floor set on reductions.
 - Lifeline and Link-up rates could not be changed without Commission approval.
 - 2. For non-basic services:
 - Sets limit on service category increases at 20%.
 - Individual service prices could be raised a maximum of 20% annually, as long as the average for all prices did not exceed the PCI.
 - No floors set on reductions.
 - For those services currently having banded rates, the existing maximum and minimum rates will be retained. Price changes can be made anywhere within the range.
 - 3. For both:
 - Increases and decreases in rates are treated the same for both basic and non-basic services. Increases in rates become effective on 30 day notice. Decreases become effective on 15 days notice. Changes are presumptively valid.
- Q. Services can be recategorized. Requests for recategorization of services would be ruled upon by the Commission within 60 days.
- R. Services can be removed from price earnings regulation all together.
- S. Defines new services as those not previously offered or not replacing an existing services.
- T. Prices new services above incremental cost.
- U. New service prices are excluded for at least 12 months from the PRI calculation.

- V. Effective within 30 days with presumptively valid approval.
- W. Floor for rates at incremental cost. No ceiling.
- X. Rate changes allowed with 15 day effective date during the first 12 months the service is offered.
- Y. Defines restructured services as those replacing an existing service.
- Z. The rate cannot exceed the rate of the existing service it is replacing.
- AA. Restructured services are placed in the PRI upon filing.
- AB. Sharing ratio is 50/50 split between the company and the ratepayers. No rate setting point was proposed. Floor is to be set at 11.5% ROE. Ceiling is to be set at 16% ROE. Sharing begins at 14% ROE. Any ROE above 16% ROE is to be 100% returned to ratepayers.
- AC. SBT can request rates be moved above PRI under the following circumstances:
 1. Earnings fall below the established floor.
 2. Structural changes form changes in the industry or Commission orders.
 3. Changes in competitive conditions as authorized by the Commission.
- AD. Plan goes into effect May 1, 1993.
- AE. Plan reviewed after four years for adjustment.
- AF. No termination date set.
- AG. Service requirements - none proposed.

McCaw takes no position at this time.

ISSUE 28 Does SBT's proposed Price Regulation Plan meet the requirements of S. 364.036(2)(a)-(g) F.S. as follows:

- A. Is the Price Regulation Plan (PRP) consistent with the public interest?

McCaw takes no position at this time.

- B. Does the PRP jeopardize the availability of reasonably affordable and reliable telecommunications services?

McCaw takes no position at this time.

- C. Does the PRP provide identifiable benefits to consumers that are not otherwise available under existing regulatory procedures?

McCaw takes no position at this time.

- D. Does the PRP provide effective safeguards to consumers of telecommunications services including consumers of local exchange services?

McCaw takes no position at this time.

- E. Does the PRP assure that rates for monopoly services are just, reasonable, and not unduly discriminatory and do not yield excessive compensation?**

McCaw takes no position at this time.

- F. Does the PRP include adequate safeguards to assure that the rates for monopoly services do not subsidize competitive services?**

McCaw takes no position at this time.

- G. Does the PRP jeopardize the ability of Southern Bell to provide quality, affordable telecommunications service?**

McCaw takes no position at this time.

- ISSUE 29 Should the Commission approve an incentive regulation plan for SBT? If so, what is the appropriate plan? If not, what is the appropriate form of regulation for SBT? How does the appropriate form of regulation meet the requirements of Chap. 364.036(a)-(g) F.S.?**

McCaw takes no position at this time.

- ISSUE 30a Should Southern Bell be permitted to cross-subsidize their competitive or effectively competitive services?**

McCaw takes no position at this time.

- ISSUE 30b Should Southern Bell's basic telephone service rates be based on the most cost effective means of providing basic telephone service?**

McCaw takes no position at this time.

- ISSUE 30c Should Southern Bell segregate its intrastate investments and expenses in accordance with an allocation methodology as prescribed by the Commission to ensure that competitive telecommunications services are not subsidized by monopoly telecommunications services?**

McCaw takes no position at this time.

- ISSUE 30d Has the Commission prescribed an allocation methodology to ensure that competitive telecommunications services are not subsidized by monopoly telecommunications services? If so, has Southern Bell followed that prescribed allocation methodology?**

McCaw takes no position at this time.

ISSUE 30e Has the replacement of copper with fiber since the last depreciation study been accomplished in a cost effective manner for adequate basic telephone service?

McCaw takes no position at this time.

ISSUE 31 Is Southern Bell's quality of service adequate?

McCaw takes no position at this time.

ISSUE 31a Do Rules 25-4.070 & 25-4.110 require Southern Bell to provide a rebate for an out-of-service condition when the company fails to notify, within 24 hours of the trouble report, that the trouble is located in the Customer Premises Equipment (CPE)?

McCaw takes no position at this time.

ISSUE 32 Are Southern Bell's test year billing units appropriate?

McCaw takes no position at this time.

ISSUE 32a Have billing units for employee concessions been properly accounted for in MFR Schedule E-1a?

McCaw takes no position at this time.

ISSUE 33a Is it appropriate to combine local measured usage with discounted intraLATA toll offerings?

McCaw takes no position at this time.

ISSUE 33b Should Southern Bell's proposed Optional Expanded Local Service (ELS) plan be approved? If not, what alternative plan, if any, should be approved on IntraLATA Toll Calls? Over what distance?

- A. \$0.25 Plan
- B. \$0.25 Plan for Residences; Businesses \$0.10 first minute and \$0.06 additional minutes
- C. Other, explain

McCaw takes no position at this time.

ISSUE 33c Is Southern Bell's proposal to eliminate or grandfather various existing measured and message rate offerings appropriate?

McCaw takes no position at this time.

ISSUE 33d If the Company's Optional ELS plan or any other alternative is approved, should stimulation be taken into account? If so, how?

McCaw takes no position at this time.

ISSUE 33e If the Commission approves an OELS or similar plan, what other action should the Commission take, if any? (e.g., route-specific switched access charges, 1+ IntraLATA presubscription)

McCaw takes no position at this time.

ISSUE 34 Southern Bell has made proposals in the areas of switched access service rates, the interconnection usage rates for mobile service providers and toll services as shown below. Should SBT's proposals be approved? Should there be any other changes in switched access, toll or mobile interconnection usage rates (e.g., reduce intrastate switched access rates to interstate levels)?

- A. To reduce switched access rates in the local transport element for both originating and terminating access from \$.01600 to \$.01328.
- B. To reduce current mobile originating peak usage rate from \$.03470 to \$.03200.
- C. To reduce the optional land-to-mobile intra-company usage charge from \$.0597 to \$.0572.
- D. To reduce the optional land-to-mobile inter-company usage charge from \$.1692 to \$.1667.
- E. To make no changes to its toll services rates.

McCaw takes no position at this time.

ISSUE 35a Should the Company's proposal to reduce Residential Call Waiting from \$3.50 to \$3.35 and the Residential Call Forwarding-Variable from \$2.45 to \$2.20 be approved?

McCaw takes no position at this time.

ISSUE 35b The Company has made no proposal to change its current Touchtone charges. Is this appropriate?

McCaw takes no position at this time.

ISSUE 35c Should customers be allowed to subscribe to Call Forward-Busy in lieu of rotary or hunting service?

McCaw takes no position at this time.

ISSUE 35d What other changes, if any, should be made to services in the Miscellaneous Service Arrangements section of Southern Bell's tariff?

McCaw takes no position at this time.

ISSUE 36 Should Southern Bell be required to provide billing and collection services for others on the same terms and conditions it provides those services to itself or to its affiliated companies?

McCaw takes no position at this time.

ISSUE 37 Southern Bell has proposed to restructure and reduce its Service Connection Charges as shown below. What changes, if any, should be made to Service Connection Charges?

<u>Current</u>		<u>Proposed</u>	
<u>Residential</u>		<u>Residential</u>	
Primary Service Order	\$25.00	Line Connection - First	\$40.00
Secondary Service Order	\$ 9.00	Line Connection - Add'l	\$12.00
Access Line Connection		Line Change - First	\$24.00
Charge - C.O. Work	\$19.50	Line Change - Add'l	\$10.00
Access Line Connection		Secondary Service Charge	\$ 9.00
Charge - New Line	\$31.50		
Number Change-per S.O.	\$ 9.00		
Number Change-per No.	\$11.50		
 <u>Business</u>		 <u>Business</u>	
Primary Service Order	\$35.00	Line Connection - First	\$60.00
Secondary Service Order	\$12.00	Line Connection - Add'l	\$13.00
Access Line Connection		Line Change - First	\$38.00
Charge - C.O. Work	\$19.50	Line Change - Add'l	\$11.00
Access Line Connection		Secondary Service Charge	\$19.00
Charge - New Line	\$31.50		
Number Change-per S.O.	\$12.50		
Number Change-per No.	\$11.50		

McCaw takes no position at this time.

ISSUE 38a Should the EAS additives on the Yulee/Jacksonville, Munson/Pensacola and Century/Pensacola routes be eliminated? If not, why not?

McCaw takes no position at this time.

ISSUE 38b What alternative toll relief plan should be approved for the routes in Docket No. 911034-TL (Between Ft. Lauderdale and Miami; Ft. Lauderdale and N. Dade; and Hollywood and Miami)?

McCaw takes no position at this time.

ISSUE 38c Should the revenue losses resulting from combining the calling areas of North and South St. Lucie be offset in this proceeding (DN 911011-TL), and if so, how?

McCaw takes no position at this time.

ISSUE 38d Should the OEAS and EOEAS plans in Section A3.7 of the General Subscriber Service Tariff be eliminated or modified? If modified, how should this be accomplished?

McCaw takes no position at this time.

ISSUE 38e Should any of The "Local Exceptions" in Section A3.8 be eliminated or modified? If modified, how should this be accomplished?

McCaw takes no position at this time.

ISSUE 39a Southern Bell has proposed no change to its current rate group structure of 12 rate groups. Is this appropriate? If not, what changes should be made?

McCaw takes no position at this time.

ISSUE 39b Southern Bell has proposed to reduce the rates and modify the rate relationships between certain of its business access lines as shown below. It has proposed no other changes to business rate relationships? Is this appropriate? What changes, if any, should be made to business access line rate relationships?

<u>SERVICE</u>	<u>REDUCTION</u>	<u>CUR./PROP.</u> <u>E-1 RATIO</u>
Business Rotary (or hunting)	31%	.50/ .35
Residential PBX Trunks	22%	.84/ .66
Business PBX Trunks	24%	2.24/1.70
Network Access Registers	24%	2.24/1.70
NARs - Small, Medium, Large	42%	1.03/ .59

McCaw takes no position at this time.

ISSUE 39c Aside from Network Access Registers, what changes, if any, should be made to Southern Bell's ESSX offerings?

McCaw takes no position at this time.

ISSUE 39d Southern Bell has proposed to introduce a new rotary rate for both its ESSX NARs and for PBX trunks. These new elements would be priced identically within each rate group. The proposed rate is 35% of the B-1 rate. Should this proposal be approved?

McCaw takes no position at this time.

ISSUE 39e The Company has made no other proposals to change its basic local exchange rates. Is this appropriate? If not, what changes should be made?

McCaw takes no position at this time.

ISSUE 39f Southern Bell has proposed to offer a lifeline rate to qualified subscribers composed of a federal credit of \$3.50 and a matching credit from the state/Southern Bell. Should this proposal be approved, modified, or rejected?

McCaw takes no position at this time.

ISSUE 39g Southern Bell has proposed an Economic Development plan by which businesses which locate in "Enterprise Zones" as defined in the Florida Enterprise Zone Statute, would receive a waiver of service connection charges, and a 50% discount off their basic local service charges for one year. Should this proposal be approved?

McCaw takes no position at this time.

ISSUE 40 Except for ELS, Southern Bell has proposed no stimulation or repression effects. Is this appropriate?

McCaw takes no position at this time.

ISSUE 41 Should the Company be required to identify, notify, and, if appropriate, provide refunds to customers that are being billed for non-required Protective Connective Arrangement (PCA) devices?

McCaw takes no position at this time.

ISSUE 42 Should Southern Bell be required to itemize customer bills on a monthly basis?

McCaw takes no position at this time.

ISSUE 42a Is Southern Bell complying with Rule 25-4.110 concerning customer billing?

McCaw takes no position at this time.

ISSUE 43 Is Southern Bell able to reconcile billed revenue to booked revenue for 1991? If not, should any adjustment be made to recognize the inability to reconcile billed and booked revenue?

McCaw takes no position at this time.

ISSUE 44 What other changes, if any, should be approved?

McCaw takes no position at this time.

ISSUE 45a What should be the effective date(s) of any rate changes approved in this docket?

McCaw takes no position at this time.

ISSUE 45b When should customers be notified of any rate changes and other Commission decisions in this docket?

McCaw takes no position at this time.

ISSUE 45c What information should be contained in the bill stuffers sent to customers?

McCaw takes no position at this time.

E. STIPULATIONS

McCaw is not aware of any stipulations between the parties in this docket.

F. PENDING MOTIONS

McCaw does not presently have any pending motions in this docket.

G. OTHER REQUIREMENTS

McCaw is unaware of any requirements of the procedural order that cannot be complied with.

Respectfully submitted this 18th day of December, 1992.

MESSER, VICKERS, CAPARELLO,
MADSEN, LEWIS, GOLDMAN & METZ, P.A.
215 S. Monroe Street, Suite 701
Post Office Box 1876
Tallahassee, FL 32302-1876
(904) 222-0720



FLOYD R. SELF, ESQ.

:sb\920260pr.mcc

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of McCaw Cellular Communications of Florida, Inc.'s Prehearing Statement in Docket No. 920260-TL has been sent by Hand Delivery (*) and/or U.S. Mail on this December 18, 1992 to the following parties of record:

Angela Green, Esquire
Division of Legal Services
Fla. Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32399

Ms. Robin Norton
Division of Communications
Fla. Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32399

Mr. Rick Wright
Division of Audit & Finance
Fla. Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32399

Jack Shreve, Esq.
Office of Public Counsel
Room 812
111 W. Madison Street
Tallahassee, FL 32399-1400

Harris R. Anthony
Nancy B. White
c/o Marshall M. Criser, III
Southern Bell
150 S. Monroe Street
Suite 400
Tallahassee, FL 32301

Joseph A. McGlothlin, Esq.
Vicki Gordon Kaufman, Esq.
McWhirter, Grandoff & Reeves
315 S. Calhoun St., Suite 716
Tallahassee, FL 32301

Mr. Joseph P. Gillan
J. P. Gillan & Associates
P. O. Box 541038
Orlando, FL 32854-1038

Peter M. Dunbar, Esq.
Haben, Culpepper, Dunbar
& French, P.A.
P. O. Box 10095
Tallahassee, FL 32301

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

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

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

Chanthina R. Bryant, Esq.
Sprint Communications Co., L.P.
3065 Cumberland Circle
Atlanta, GA 30339

C. Everett Boyd, Esq.
Ervin, Varn, Jacobs,
Odom & Ervin
P. O. Drawer 1170
Tallahassee, FL 32302

Michael W. Tye, Esq.
AT&T Communications of the
Southern States, Inc.
106 East College Avenue
Suite 1410
Tallahassee, FL 32301

Mr. Monte Belote
Fla. Consumer Action Network
4100 W. Kennedy Blvd., #128
Tampa, FL 33609

Mr. Dan B. Hendrickson
P. O. Box 1201
Tallahassee, FL 32302

Bill L. Bryant, Jr., Esq.
Foley & Lardner
P. O. Box 508
Tallahassee, FL 32302-0508

Michael B. Twomey, Esq.
Assistant Attorney General
Department of Legal Affairs
Room 1603, The Capitol
Tallahassee, FL 32399-1050

Benjamin H. Dickens, Jr., Esq.
Blooston, Mordkofsky,
Jackson & Dickens
2120 L Street, N.W.
Washington, DC 20037

Mr. Douglas S. Metcalf
Communications Consultants,
Inc.
1600 E. Amelia Street
Orlando, FL 32803-5505

Thomas F. Woods, Esq.
Gatlin, Woods, Carlson &
Cowdery
1709-D Mahan Drive
Tallahassee, FL 32308

Mr. Cecil O. Simpson, Jr.
Regulatory Law Office
901 North Stuart Street
Arlington, VA 22203-1837

Mr. Charles King
Snavelly, King & Associates,
Inc.
1220 L Street, NW
Washington, DC 20005

Mr. Lance C. Norris, President
Florida Pay Telephone
Association
8130 Baymeadows Circle, West
Suite 202
Jacksonville, FL 32256

BY: 