



Southern Bell

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April 22, 1993

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

~~920260-TL~~

Re: Minimum Filing Requirements Waiver Requests

Dear Mr. Tribble:

Attached are requests for Waiver and Modification of certain schedules in the Florida Minimum Filing Requirements that Southern Bell plans to file July 2, 1993. Please forward your concurrence to me as soon as possible.

I can be reached at 224-7798 if you wish to discuss further.

Sincerely,

Anthony M. Lombardo

Attachments
cc: All parties of record

A BELL SOUTH Company

DOCUMENT NUMBER-DATE
04507 APR 23 83
FPSC-RECORDS/REPORTING

BellSouth Telecommunications, Inc.
d/b/a Southern Bell
Request for Waiver and Modification
of Minimum Filing Requirements

As noted in Southern Bell's March 26, 1993 "test year letter," Southern Bell plans to file MFRs utilizing forecast year 1993. In compliance with Rule 25-4.141(2)(a), Florida Administrative Code, Southern Bell will also file MFRs utilizing the 1992 actual results. In addition, pursuant to Rule 25-4.141(4), Southern Bell requests modification or waiver of MFR requirements as follows:

(A)

InterLATA, IntraLATA, and Local Detail

Southern Bell's budget process forecasts total Intrastate operations, but does not provide a breakdown of InterLATA and IntraLATA expense and investment. Southern Bell proposes to populate the Total Intrastate, omitting InterLATA, IntraLATA, and Local detail.

(B)

- Schedule B-5a - Monthly Operating Reports
- Schedule C-24h - Monthly Cost Studies
- Schedule C-24i - Traffic and Revenue Settlements Agreement
- Schedule E-1a - Present and Proposed Rates and
Revenue Increases
- Schedule F-2 - Demand and Facility Charts

Southern Bell requests that it not be required to file the twenty (20) copies of these reports as set forth in Rule 25-4.141(1)(i). The monthly operating reports consist of approximately 1134 pages of information, the monthly cost studies consist of 96 sheets of microfiche, the settlements agreements consist of approximately 1024 pages of information, the rates and revenue increases consist of approximately 1100 pages, and the Demand & Facility (D&F) charts consist of approximately 1250 pages. Southern Bell proposes to limit the number of copies served for each of these schedules to three (3) copies.

(C)

Schedule B-6a - Working Capital
Materials and Supplies

The detail requested in the Schedule B-6a format is not available in Southern Bell's accounting system on a forecasted or historical basis. Therefore, for historical data Southern Bell proposes to provide material data in the format shown in Attachment 1, as it did in the November 1991 MMFRs in Docket 911109-TL and in the test year 1991 Minimum Filing Requirements previously filed in Docket 920260-TL. For forecasted data, Southern Bell proposes to provide the forecasted balance of Account 1220 by month.

(D)
Schedule B-7b - Abandoned Projects

Southern Bell proposes to provide total forecasted abandoned projects. The forecast of this amount will be trended based on historical information. The identity of the specific projects that could subsequently be abandoned is not known in advance.

(E)
Schedule B-11 - Budgeted Expenditures
for Central Office/Toll Center Additions

Southern Bell requests a waiver of the requirement to provide 1996 data. Southern Bell's 1993 budget does not include projections of 1996, and the information is not yet available elsewhere.

(F)
Schedule C-7 - Charitable Contributions and
Social Service Club Dues and Expenses

Charitable contributions are forecasted only in the aggregate, based on trended data, and are therefore available only in total on a budget basis. Under its current regulatory plan, Southern Bell excludes all of these expenses from regulatory treatment. Therefore, this schedule is not applicable and Southern Bell proposes to exclude it from both the historical and forecasted schedules.

(G)
Schedule C-11a - Bare Gross Payroll Dollars by Function

Southern Bell requests a waiver of the requirement to provide forecasted salary for construction and cost of removal. Southern Bell forecasts salary levels within expense accounts, but does not specifically forecast the salary amounts capitalized and included in non-expense accounts.

(H)
Schedule C-11b - Company and Contract Personnel
by Department
Schedule C-11c - Summary of Employee Compensation
Schedule C-11d - Loaded Hourly Labor Rate

Southern Bell contracts on an individual job basis rather than on an employee basis. Thus, the contract personnel information sought by this schedule is not available, and Southern Bell requests a waiver of the requirement to provide the contract personnel data requested in this schedule. In addition, Southern Bell proposes to revise job titles where the titles listed in Schedule C-11b are no longer applicable (Attachment 2).

(I)
Schedule C-24f - Independent Company Settlements

The pool data on page 2 of this schedule is prepared from the cost study data submitted by all pool participants. That study is not due until July 1, 1993. Southern Bell proposes to omit page 2 of Schedule C-24f from its July 2 filing, and instead provide the data when it is available. This information should be available on or before August 16, 1993.

(J)
Schedule C-28, Cost of Equal Access and
Network Reconfiguration

Southern Bell proposes to provide the data in the revised format shown in Attachment 3. The format of Schedule C-28 requires more detail than is available from the Company's Equal Access/Network Reconfiguration tracking procedures. In Order 14452 of Docket No. 820537, the Commission utilized the benefit of depooling as a source of funds to offset Equal Access. Subsequently, in Docket No. 880069, rates were set for total revenue requirements which included Equal Access costs. Therefore, the requested information pertaining to interexchange carrier reimbursement and associated finance cost is not applicable to Southern Bell.

(K)
Schedule D-11 - Market Data

Southern Bell requests that it be allowed to omit forecasted earnings per share and dividend per share information. In order to provide this data to the Commission on a forecasted basis, Southern Bell would be required to notify all shareholders, the Securities and Exchange Commission, and the general public of the forecast. This would be impractical and economically burdensome.

(L)
Schedule E-8 - Zone/mileage Charges

Because Florida Zone/Mileage charges applicable to local exchange service have been eliminated, this schedule is not applicable.

(M)
Schedule F-1b - Annual Quality of Service Standards

The requested Call Completions results (item No. 2 of this schedule) are not available in the format of this schedule. Various results exist but not based on the total attempts versus completions for the types of calls listed (i.e., Intra-Office, Inter-Office, EAS, DDD-Company, DDD-State).

The requested Adequacy of Intercept results (item No. 4 of this schedule), including Changed Number, Disconnected Service, and

Disconnected Non-Pay, are not readily available in any tracking system deployed by Southern Bell. To develop systems capable of providing this information would be an excessive economic burden. However, periodic checks are employed to insure compliance.

Repair Service Rebates-24 Hours (item No. 6 of this schedule), is also a result not readily available. There are two major computer systems employed to provide rebates to customers whose service has been interrupted for more than 24 hours: IMOS and Comptrollers Billing System. The systems do not interact to provide management summary reports and at this time are not capable of doing so as a result of different billing cycles in the Comptrollers System. The programming required to modify these systems to provide these summary reports would be impractical and would be an excessive economic burden. However, periodic manual checks are made to determine if rebates are automatically being provided.

(N)
Schedules G-1 through G-9

Interim rates are not applicable since no interim rates changes will be requested in the July 2 submission.

(O)
Additional Minor Changes

In addition, we propose to make the same minor changes to several forms that we have made in the 1991 and 1990 filings. These include:

- (1) Schedule A-6b - Add lines for Cash Working Capital and Uncollectibles.
- (2) Schedule A-2a - Omit line 7 "Vehicles and Other Work Equipment" (Part 31 account) and renumber lines so rows match A-2d.
- (3) Schedules B-4a and B-4b - Add account 2220 and account 2351, and renumber the rows.
- (4) Schedules C-2a and C-2b - Correct the calculation description for the headings in columns 15 and 16 of Schedule C-2a, and column 7 of Schedule C-2b.
- (5) Schedule B-3b - Insert an additional column to show Southern Bell "Total Company" data.
- (6) Schedule B-3a - Use Part 32 accounts designated in Schedule B-1 of Form M.
- (7) Schedule D-9 - Use the revised format used previously that shows the allocation of total company balances to Florida.

FLORIDA PUBLIC SERVICE COMMISSION

Company Southern Bell Telephone & Telegraph Co.
 Docket No. _____
 Test Year _____

- Schedule B-6a
 Page of _____
 Witness Responsible _____

Check Whether Data Is:
 Historic or Projected
 Average or Year End

Line No.	Year	Month	ACCOUNT 1220.1200 Plant Supplies		ACCOUNT 1220.1100 Plant Supplies		ACCOUNT 1220.1300 Motor Vehicle		ACCOUNT 1220.1400 Central Office, Origination		ACCOUNT 1220.1400 Central Office, Origination	
			Consumed	Balance	Consumed	Balance	Consumed	Balance	Consumed	Balance	Consumed	Balance
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
1.												
2.												
3.												
4.												
5.												
6.												
7.												
8.												
9.												
10.												
11.												
12.												
13.												
14.												
	Total for Year											
	Monthly Average for Year											

Line No.	Year	Month	ACCOUNT 1220.1300 Company Communications		ACCOUNT 1220.1800 Stock Held For Reuse		ACCOUNT 1220.1900 Other Material		TOTAL ACCOUNT 1220.1000	
			Consumed	Balance	Consumed	Balance	Consumed	Balance	Consumed	Balance
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
13.										
14.										
17.										
18.										
19.										
20.										
21.										
22.										
23.										
24.										
25.										
26.										
27.										
28.										
	Total for Year									
	Monthly Average for Year									

Breakdown of Personnel by Department

Attachment 2

FLORIDA PUBLIC SERVICE COMMISSION

Company Southern Bell Telephone & Telegraph Co.

Docket No.

Test Year

Schedule C-11b

Page 1 of 1

Witness Responsible:

Check Whether Data Is:
 Historic or Projected
 Average or Year End

No.	Department	Company Personnel					Contract Personnel			
		Total Personnel		Salaried		Hourly		Supervisory	Engineer or Foreman	Craft
		Company	Contract	Supervisory	Other	Regular	Temporary			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
	COMPTROLLERS									
	CUSTOMER SERVICES									
	EXECUTIVE									
	LEGAL									
	MARKETING									
	NETWORK									
	OPERATOR SERVICES									
	PERSONNEL									
	PROPERTY, PROCUREMENT & SERVICES MANAGEMENT									
	TOTAL									

Supporting Schedules: None

Recap Schedules: None

Cost of Equal Access and Network Reconfiguration

FLORIDA PUBLIC SERVICE COMMISSION
 Company
 Doctel No.
 Test Year

Schedule C-28
 Page 1 of 1
 Witness Responsible

Check whether Data Is:
 Historic or Projected
 Average or Year End

	Test Year			Test Year - 1			Total to Date		
	Total (1)	Interstate (2)	Intrastate (3)	Total (4)	Interstate (5)	Intrastate (6)	Total (7)	Interstate (8)	Intrastate (9)
Investment									
1 General Support									
2 Central Office Equipment									
3 Info Orig/term Equipment									
4 Cable & Wire Facilities									
5 Other									
6 Subtotal (1 thru 5)									
7 Accumulated depreciation									
8 Associated deferred taxes									
9 Unamortized investment tax credits									
10 Subtotal (6 thru 9)									
Expense									
11 Plant Specific									
12 Plant Non-specific									
13 Depreciation									
14 Customer Services									
15 Corporate Operations									
16 Other (includes Part 36 A/C info.)									
17 Subtotal (11 thru 16)									
18									
19 Total (17 + 18)									
20 Amortization Amount									

Supporting Schedules:

Recap Schedules: