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REPLY TO:

December 6, 1993

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

HAND DELIVERY

Re: Docket Nos. 920260-TL; 910163-TL; 910727-TL; 900960-TL
and 911034-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket are the following documents:

1. Original and fifteen copies of Florida Pay Telephone Association, Inc.'s Prehearing Statement; and,
2. A disk in Word Perfect 5.1 containing a copy of the document entitled "Rate.Prehearing".

ACK _____
 AFA 3 _____
 APP _____
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 CMU _____
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 LES 1 KAH/rl
 LHM 6 Enclosures
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 OTH _____

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

Kenneth A. Hoffma
Kenneth A. Hoffma

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12985 DEC-6 93

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
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In Re: Comprehensive review of revenue requirements and rate stabilization plan of Southern Bell.)	Docket No. 920260-TL
In Re: Investigation into the integrity of Southern Bell's repair service activities and reports.)	Docket No. 910163-TL
In Re: Investigation into Southern Bell's compliance with Rule 25-4.110(2), F.A.C., Rebates.)	Docket No. 910727-TL
In Re: Show cause proceeding against Southern Bell for misbilling customers.)	Docket No. 900960-TL
In Re: Request by Broward Board of County Commissioners for extended area service between Ft. Lauderdale, Hollywood, North Dade and Miami.)	Docket No. 911034-TL
)	Filed: December 6, 1993

**FLORIDA PAY TELEPHONE ASSOCIATION, INC.'S
PREHEARING STATEMENT**

THE FLORIDA PAY TELEPHONE ASSOCIATION, INC. ("FPTA"), pursuant to Florida Public Service Commission ("Commission") Order No. PSC-93-1726-PCO-TL and Rule 25-22.038(3), Florida Administrative Code, respectfully submits the following Prehearing Statement in the above-captioned docket.

A. WITNESSES

The FPTA will not sponsor a witness in this proceeding.

B. EXHIBITS

The FPTA has not prefiled any exhibits in this proceeding. The FPTA reserves its right to use exhibits for purposes of cross-examination in this proceeding.

DOCUMENT NUMBER-DATE

12985 DEC-68

FPSC-RECORDS/REPORTING

C. BASIC POSITION

The FPTA's primary focus in this proceeding is on the interconnection rates and usage charges non-LEC pay telephone providers pay to Southern Bell. Charges for Billed Number Screening and Touchtone service should be eliminated. Southern Bell's optional ELS plan should be approved, if amended, to eliminate the \$12.00 minimum usage charge required under the 50 percent discount option. The \$12.00 minimum usage charge serves to impede the Commission's goal of increasing the number of pay telephones placed at public interest locations. This result obtains because public interest pay telephones typically experience low calling volumes thereby paying more than high volume pay telephones which are more likely to fully utilize the \$12.00 minimum charge as a credit against usage charges under the Optional ELS plan. The Commission should not condone such discrimination inherent in Southern Bell's request to implement usage sensitive pricing. Further, approval of the optional ELS plan, as amended, should also be conditioned on the requirement that Southern Bell impute the cost and contribution reflected in the rates paid by non-LEC pay telephone providers to its own pay telephone service. Finally, Southern Bell should be required to provide non-LEC pay telephone providers itemized, detailed bills for local and 0+ intraLATA calls including the number called, date of call and the total length of time of the call.

D. ISSUES AND POSITIONS

The FPTA takes "No position at this time" as to all issues in this proceeding apart from the specific issues and positions set forth below:

Issue 24c: What amount of revenue, if any, is subject to disposition for 1993 due to orders issued on Docket Number 920260? How should this revenue be disposed of?

FPTA's Position: Any and all refunds arising from this proceeding should be fairly allocated, on a pro-rata basis, to all Southern Bell customers who pay recurring regulated monthly charges.

Issue 28: Southern Bell has proposed an "Optional Expanded Local Service" (ELS) plan. Customers who subscribe would pay \$.02 per minute for all calls within the existing local calling area and \$.08 per minute for all intraLATA calls up to approximately forty miles. The proposed plan includes many components and features including seven-digit dialing, reduced flat-rate buy-ins and usage caps. It would be available to both business and residence customers.

a. Should Southern Bell's proposed Optional Expanded Local Service (ELS) plan be approved? If not, what alternative plan, if any, should be approved and what should be the criteria? What is the test year revenue impact?

FPTA's Position: Southern Bell's proposed Optional ELS Plan should be approved, if amended, to eliminate the \$12.00 minimum usage charge required under the 50 percent discount option.

Southern Bell should also be required to impute the cost and contribution reflected in the rates paid by non-LEC pay telephone providers to its own pay telephone service.

b. If the Company's Optional ELS plan or any other alternative is approved, should stimulation be taken into account?

FPTA's Position: Yes, the effect of stimulation and/or repression should be considered when rates are changed, if reasonable data is available to calculate the effect.

c. 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, if intraLATA presubscription).

FPTA's Position: The Commission should continue its investigation of and approve intraLATA presubscription in Docket No. 930330-TP. In addition, the Commission should require Southern Bell to file a separate section in its tariffs consolidating all rates and charges for all unbundled services offered to non-LEC pay telephone providers.

d. Is Southern Bell's proposal to amend, eliminate, or grandfather various existing measured and message rate offerings appropriate?

FPTA's Position: No position.

Issue 30: Should SBT be required to offer Billed Number Screening for collect and third number billed calls at no charge to subscribers. If so, what is the test year revenue impact?

FPTA's Position: Yes. FPTA is not aware at this time of the test year revenue impact of eliminating these charges; however,

Southern Bell has acknowledged that the cost of providing Billed Number Screening is de minimus. Further imposition of these charges is unjust, unreasonable and unduly discriminatory.

Issue 30b: The Company has made no proposal to change its current Touchtone charges. Is this appropriate? If not, what action should be taken and what is the test year revenue impact?

FPTA's Position: The Touchtone charges should be eliminated.

Issue 33d: The Company made no other proposals to change its basic local exchange rates. Is this appropriate? If not, what changes should be made?

FPTA's Position: Charges for Billed Number Screening for collect and third number billed calls and Touchtone charges should be eliminated.

Issue 35: Should Southern Bell be required to itemize customer bills on a monthly basis?

FPTA's Position: Yes. Southern Bell should be required to provide non-LEC pay telephone providers itemized, detailed bills for local and 0+ intraLATA calls setting forth the number called, date of call, time call began, time call terminated and total calling time (i.e., total length of time of call).

E. STIPULATIONS

The FPTA is not aware of any stipulations between the parties to this proceeding.


F. PENDING MOTIONS

The FPTA does not presently have any pending motions in this proceeding.

G. OTHER REQUIREMENTS

The FPTA is unaware of any requirements of the procedural order with which the FPTA cannot comply.

Respectfully submitted this 6th day of December, 1993.


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Association, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing in Docket No. 920260-TL has been sent by Hand Delivery (*) and/or U.S. Mail on this December 6, 1993 to the following parties of record:

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