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March 31, 1994

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

Dear Mr. Tribble:

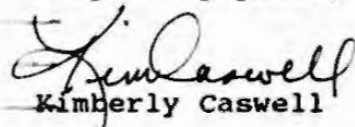
ACK ✓
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LIT
C.B.
H.P.
W.

Re: Docket No. **921074-TP**
In the Matter of the Petition of Intermedia
Communications of Florida, Inc. for Expanded
Interconnection for AAVs within LEC Central Offices

Please find enclosed for filing an original and fifteen copies of
GTE Florida Incorporated's Petition for Extension in the above-
referenced matter.

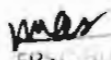
Service has been made as indicated on the attached Certificate of
Service. If you have any questions, please contact the undersigned
at 813-228-3094.

Very truly yours,


Kimberly Caswell

KC:mcp
Enclosures

RECEIVED & FILED


FPSC BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for expanded)
interconnection for alternate)
access vendors within local)
exchange company central offices)
by INTERMEDIA COMMUNICATIONS OF)
FLORIDA, INC.)
_____)

DOCKET NO. 921074-TP
FILED: March 31, 1994

GTE FLORIDA INCORPORATED'S
PETITION FOR EXTENSION

By Order number PSC-94-0285-FOF-TP, issued in this docket on March 10, 1994, the Commission ordered the local exchange companies (LECs) to submit zone-density pricing plans and tariff proposals, with cost data, by March 31, 1994. The Commission instructed the LECs to use their FCC interstate zone-density tariffs and plans as a guide. With this Petition, GTE Florida Incorporated (GTEFL) seeks an extension of the filing date for the zone-density pricing plans and tariff proposals. In addition, GTEFL includes its Comments regarding the contract serving arrangement (CSA) process, in accordance with the Commission's Order.

GTE Corporation's (GTE's) zone-density pricing plans for interstate special access services were approved in June of 1993. Actual interstate zone pricing tariffs have not been filed because GTEFL has not yet had any requests for collocation.

GTE's methodology for determining pricing zones used a measure of traffic density stated in terms of equivalent high capacity DS1 circuits. Central offices were assigned to Zones 1, 2, or 3 based on the number of equivalent DS1s in each end office. Since the initial zone pricing plan was approved by the FCC, GTE has performed additional analysis which shows that the revenue

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distribution among the zones was too heavily weighted toward Zone 1, which would make it difficult to keep the zone plan essentially revenue neutral. In other words, the contemplated price reductions in the Zone 1 areas would place too much upward pressure on the more sparsely populated Zone 3 areas. As a result, GTE is in the process of redeveloping its zone-density pricing plans for submission to the FCC late this summer.

In practical terms, GTEFL believes it is important for the Company to harmonize its intrastate and interstate zone pricing plans. GTEFL's federal zone pricing revisions will correct the weighting methodology and prevent excessive rate increases for less dense areas. GTEFL believes this is a commendable objective at the state level, as well. Different zone schemes could cause billing problems, customer confusion, and greater administrative burdens.

Conceptually, classification of offices into zones for both jurisdictions should depend on the same measures and the same relationships among the zones should hold true. In fact, this Commission has directed the LECs to use the FCC plans and tariffs as a guide. Even though the LECs will need to adjust the intrastate plans and tariffs as necessary, it will be impossible to devise a consistent scheme until the interstate plans are revised in accordance with the more appropriate revenue distribution analysis. If GTEFL attempts to file the intrastate plans while the interstate scheme remains unsettled, a later, amendatory filing with the Commission may be necessary.

In addition, zone-density pricing as outlined by the FCC is intended to affect only the pricing of high capacity, DS1 and DS3 services. GTEFL does not currently have a tariffed DS3 service in place. Therefore, the Company would propose intrastate zone pricing for DS1 services only. While GTEFL continues to support the zone-pricing concept, competitive pressures on DS1 services can be met for an interim period through existing tariffed optional payment plans and CSAs. GTEFL will still, of course, file the physical collocation tariffs in accordance with the terms ordered by the Commission.

For these reasons, GTEFL asks the Commission to extend the time for filing its zone-density pricing plans and tariffs until GTE's revised interstate zone-density plans are approved by the FCC. GTEFL believes it is better for the Company to file more meaningful and appropriate data at a somewhat later date than it is to file a plan now that may need to be altered later. No party will be harmed by approval of this request for extension. If any requests for expanded interconnection arise, GTEFL fully intends to satisfy them in accordance with the interconnection and collocation terms established by the Commission.

Finally, the Order asked for comments on improvements to the CSA process along with the LECs' zone-density pricing plans and tariffs. Although GTEFL has not yet filed such plans or tariffs, its CSA comments are set forth here.

GTEFL has been unable to identify opportunities for meaningful improvement of the CSA process. That process imposes obligations

on GTEFL that are not shared by its competitors. No matter how much CSA procedures are streamlined within the Company, they will still be an unfair burden on the LECs. GTEFL continues to believe that all market participants should enjoy equal flexibility in providing innovative service arrangements to their customers.


Respectfully submitted on March 31, 1994.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of GTE Florida Incorporated's
Petition for Extension in Docket No. 921074-TP was sent by U. S.
mail on March 31, 1994, to the parties on the attached list.



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