### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION



In Re: Comprehensive Review of the) Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone & Telegraph Company )

Docket No. 920260-TL

Filed: July 10, 1995

# FLORIDA MOBILE COMMUNICATIONS ASSOCIATION, INC.'S PREHEARING STATEMENT

Florida Mobile Communications Association, Inc. ("FMCA"), by its undersigned counsel, and pursuant to Order No. PSC-95-0642-PCO-TL issued May 24, 1995, respectfully submits its Prehearing Statement in the above-captioned docket.

#### A. Witnesses

At this time, FMCA does not intend to call any witnesses. FMCA reserves the right to offer witnesses to respond to Commission inquiries and witnesses to address issues not presently designated which may be designated by the Prehearing Officer at the prehearing conference.

### B. Exhibits

FMCA intends to offer as exhibits the Commission's Order to be entered in Docket No. 940235-TL, and all or portions of Staff's Recommendation in the same docket. FMCA may also request the Commission to take official recognition of all or portions of Southern Bell's mobile carrier tariff, Section A35 of the Southern Bell General Subscriber Service Tariff. FMCA also reserves the right to offer exhibits related to any additional testimony or under the same circumstances described in Section "A" above. FMCA also reserves the right to introduce exhibits for examination, impeachment or any other purpose authorized by applicable Florida Rules of Evidence or Commission Rules.

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## C. Statement of Basic Position

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FMCA is opposed to Southern Bell's proposal to implement ECS plans. Some portion of the \$25 million rate reduction should be utilized, if necessary, to implement the decisions made by the Commission in Docket No. 940235-TL relating to mobile carrier interconnection.

# D. FMCA's Position on the Issues

- Issue 1: Which of the following proposals to dispose of \$25
  million for Southern Bell should be approved?
- (1) SBT's proposal to implement the Extended Calling Service plan pursuant to the tariff filed on May 15, 1995. (T-95-304.)
- (2) CWA's proposal to reduce each of the following by \$5 million:
- (i) Basic "lifeline" senior citizens telephone service;
  - (ii) Basic residential telephone service;
- (iii) Basic telephone service to any organization that is non-profit with 501(c) tax exempt status;
- (iv) Basic telephone service of any public school, community college and state university;
- (v) Basic telephone service of any qualified disabled ratepayer.
- (3) McCaw's and FMCA's proposal that a portion be used, if necessary, to implement the decisions rendered in Docket No. 940235-TL.
  - (4) Any other plan deemed appropriate by the Commission.

\* FMCA's Position: The McCaw-FMCA proposal should be approved, as the Commission's decision in Docket No. 940235-TL will implement important policy decisions governing mobile carrier wireless interconnection. The Southern Bell proposal should be denied as anti-competitive. The CWA proposals should be denied. FMCA takes no position on any other proposals except that the amounts available should be after the McCaw-FMCA proposal is funded.

Issue 2: If the Southern Bell proposal is approved, should the Commission allow competition on the Extended Calling Service Routes? If so, what additional actions, if any, should the Commission take?

\* FMCA Position: FMCA takes no position on Issue 2 at this time.

Issue 3: When should the tariffs be filed and what should be
the effective date?

\* FMCA's Position: The tariffs should be filed within 15 days of the Commission's ruling and effective October 1, 1995.

Issue 4: Should this docket be closed?

\* FMCA's Position: No.

DATED this 10th day of July, 1995.

Respectfully submitted,

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ATTORNEYS FOR FLORIDA MOBILE COMMUNICATION ASSOCIATION, INC.

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing of Florida Mobile Communication Association, Inc.'s Prehearing Statement has been furnished by U.S. Mail on this \_\_\_\_\_\_ day of July, 1995, to the following:

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