

LAW OFFICES  
BLOOSTON, MORDKOFKY, JACKSON & DICKENS  
2120 L STREET, N.W.

HAROLD MORDKOFKY  
ROBERT M. JACKSON  
BENJAMIN H. DICKENS, JR.\*  
JOHN A. PRENDERGAST  
GERARD J. DUFFY  
RICHARD D. RUBINO\*  
BRIAN D. ROBINSON  
SUSAN J. BAHR  
NICHOLAS J. NIKOLOPOULOS\*

WASHINGTON, D.C. 20037  
(202) 659-0830  
TELECOPIER: (202) 828-5568

ARTHUR BLOOSTON  
OF COUNSEL  
EUGENE MALISZEWSKYJ  
DIRECTOR OF ENGINEERING  
PRIVATE RADIO  
SEAN A. AUSTIN  
DIRECTOR OF ENGINEERING  
COMMON CARRIER RADIO

July 7, 1995

\*NOT ADMITTED IN D.C.

RECEIVED  
JUL 10 1995  
FILE COPY

WRITER'S DIRECT DIAL NO.  
(202) 828-5510

File No. 4124

Via Federal Express

Mrs. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

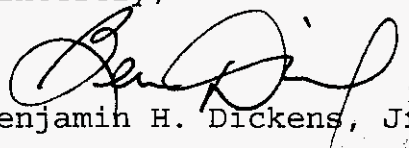
Re: Docket No. 920260-TL

Dear Mrs. Bayo:

Enclosed for filing in the referenced proceeding are the  
ACK original and 15 copies of the prehearing statement of the Florida  
Ad Hoc Telecommunications Users Committee.

APP A copy of this letter is enclosed for your convenience. I  
would appreciate it if you could stamp it as a receipt copy and  
return it to me. Parties shown on the attached certificate of  
service have been served with a copy of this letter.

Sincerely,

  
Benjamin H. Dickens, Jr.

BHD:ktd  
cc: All parties of record

RECEIVED

99  
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

06498 JUL 10 95

FPSC-RECORDS/REPORTING



(f) **Policy questions** - Whether SBT has appropriately priced services utilized by business users. Ad Hoc submits that SBT has incorrectly priced such services.

(g) **Ad Hoc positions** -

Issue 1a: - SBT's ECS proposal will discourage the expansion of competition by, in effect, remonopolizing the southeast LATA, something which appears contrary to the PSC's intent with their presubscription Order in Docket 930330-TP. ECS as proposed would effectively foreclose that market to further competition by the IXCs. The Legislature clearly wanted to create a competitive telecommunications market for local and toll service within Florida on the assumption that competition would bring more and better services and lower prices to its citizens and business users.

Issue 1b: - CWA's proposal will lower rates for certain groups of subscribers, but does not enhance competition for any services or markets and provides few benefits to the majority of users in Florida.

Issue 1c: - McCaw's proposal is speculative and should not be resolved in this docket.

Issue 1d: - A Commission alternative is the only option.

Ad Hoc submits that increased competition and customer choice can better be achieved by using the available revenues to review those tariffed elements and rates for which there is competition, but which are the most overpriced using, as a benchmark, the relative contribution of various competitive services provided by Southern Bell.

Using this revenue to reprice PBX and DID services toward cost, and to establish a level of contribution similar to ESSX service would serve to reopen a product and service market which has been stifled by inconsistent pricing decisions. Business services should be consistently costed (including contribution) and priced as discussed in Ad Hoc's testimony.

Issue 2: - The Commission should allow full competition on all toll routes within Florida.

Issue 3: - The changes should become effective as soon as possible.

Issue 4: - No, this docket should remain open until the settlement agreement has been fully satisfied.

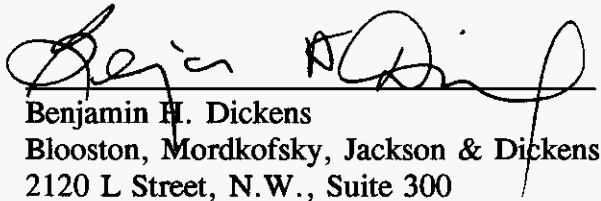
(h) **Stipulations** - None

(i) **Pending motions** - Ad Hoc has no pending motions before the Commission in this docket.

(j) **Requirements** - Ad Hoc has complied with all requests and discovery by any party or the Commission in this docket.

Respectfully submitted,

FLORIDA AD HOC TELECOMMUNICATIONS USERS' COMMITTEE:

A handwritten signature in black ink, appearing to read "Benjamin H. Dickens", written over a horizontal line.

Benjamin H. Dickens  
Blooston, Mordkofsky, Jackson & Dickens  
2120 L Street, N.W., Suite 300  
Washington, DC 20037-1527  
Tel (202) 828-5510  
Fax (202) 828-5568

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

Mr. Don Bell  
2880 N. Meridian Road  
Tallahassee, FL 32312

Michael A. Gross, Esq.  
Assistant Attorney General  
Department of Legal Affairs  
Room PL-01, The Capitol  
Tallahassee, FL 32399-1050

Mr. Douglas S. Metcalf  
Communications Consultants, Inc.  
P.O. Box 1148  
Winter Park, FL 32790-1148

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

Mark Richard, Esq.  
Attorney for Communications Workers  
of America Locals 3121, 3122 and 3107  
304 Palermo Avenue  
Coral Gables, FL 33134

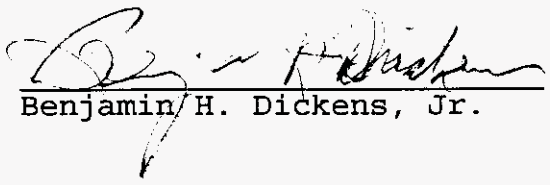
Mr. Cecil O. Simpson, Jr.  
Regulatory Law Office  
901 North Stuart Street  
Arlington, VA 22203-1837

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

Mr. Lance C. Norris, President  
Fla. Public Telecommunications  
Association  
125 S. Gadsden Street, Suite 200  
Tallahassee, FL 32301

Angela B. Green  
Fla. Public Telecommunications  
Association  
125 S. Gadsden Street, Suite 200  
Tallahassee, FL 32301

Mr. Mike Fannon  
Cellular One  
2735 Capital Circle, NE  
Tallahassee, FL 32308

By:   
Benjamin H. Dickens, Jr.