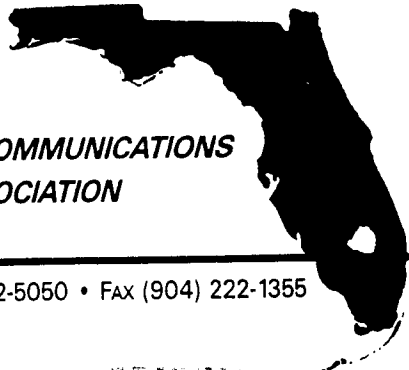


FLORIDA
PUBLIC
TELECOMMUNICATIONS
ASSOCIATION



125 SOUTH GADSDEN STREET, SUITE 200 • TALLAHASSEE, FLORIDA 32301 • (904) 222-5050 • Fax (904) 222-1355

November 6, 1995

ORIGINAL
FILE COPY

Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

Re: Docket No. 950737-TP

Dear Ms. Bayó:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of the Florida Public Telecommunications Association, Inc.'s Post-Hearing Brief. Also enclosed is a 3.5" diskette containing a copy of this filing (in WordPerfect 5.1 format). The name of the filing on the diskette is FILING.PSC.

An extra copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Thank you for your assistance with this filing.

Sincerely,

Angela B. Green
General Counsel

NOV 6 1995

Enclosures

cc: All Parties of Record

950737e.abg

RECEIVED
NOV 6 1995
DIVISION OF RECORDS & REPORTING

DOCUMENT NUMBER-DATE

10919 NOV-6 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into) Docket No. 950737-TP
temporary local telephone number)
portability solution to implement) Filed: November 6, 1995
competition in local exchange)
telephone markets.)
_____)

**FLORIDA PUBLIC TELECOMMUNICATIONS ASSOCIATION, INC.'S
POST-HEARING BRIEF**

Pursuant to Rule 25-22.056, Florida Administrative Code, and Order No. PSC-95-0886-PCO-TP, issued July 25, 1995, the Florida Public Telecommunications Association, Inc. ("FPTA"), through its undersigned counsel, hereby submits its Post-Hearing Brief in the above-captioned docket.

FPTA'S BASIC POSITION

The issue of local telephone number portability must be resolved in a manner that is fair to all providers if the State of Florida is ultimately going to have vigorous competition in the local telecommunications market.

ISSUES

ISSUE 1: What is the definition of temporary number portability pursuant to Section 364.16(4), Florida Statutes?

**** SUMMARY OF FPTA'S POSITION:** This issue has been stipulated by the parties. **

DISCUSSION: This issue has been stipulated by the parties.

DOCUMENT NUMBER-DATE

10919 NOV-6 95

FPSC-RECORDS/REPORTING

ISSUE 2: What technical solutions will be available by January 1, 1996, to provide temporary number portability?

**** SUMMARY OF FPTA'S POSITION:** This issue has been stipulated by the parties. **

DISCUSSION: This issue has been stipulated by the parties.

ISSUE 3: What are the advantages and disadvantages of each solution identified in Issue 2?

**** SUMMARY OF FPTA'S POSITION:** FPTA takes no position on any of the issues beyond those addressed in the stipulation between the parties. **

DISCUSSION: FPTA takes no position beyond the issues that are addressed in the stipulation between the parties.

ISSUE 4: What costs are associated with providing each solution identified in Issue 2?

**** SUMMARY OF FPTA'S POSITION:** FPTA takes no position on any of the issues beyond those addressed in the stipulation between the parties. **

DISCUSSION: FPTA takes no position on any of the issues beyond those addressed in the stipulation between the parties.

ISSUE 5: How should the costs identified in Issue 4 be recovered?

**** SUMMARY OF FPTA'S POSITION:** FPTA takes no position on any of the issues beyond those addressed in the stipulation between the parties. **

DISCUSSION: FPTA takes no position on any of the issues beyond those addressed in the stipulation between the parties.

ISSUE 6: What is/are the most appropriate method(s) of providing temporary number portability?

**** SUMMARY OF FPTA'S POSITION:** This issue has been stipulated by the parties. **

DISCUSSION: This issue has been stipulated by the parties.

ISSUE 7: What are the appropriate parameters, costs and standards for the method(s) identified in Issue 6?

**** SUMMARY OF FPTA'S POSITION:** This issue has been stipulated by the parties. **

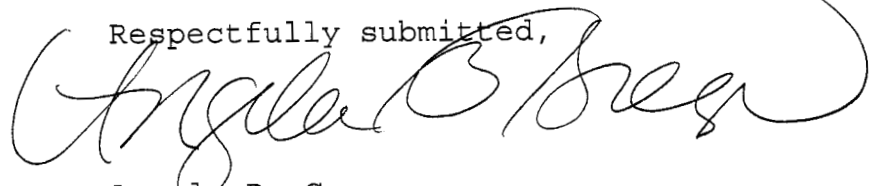
DISCUSSION: This issue has been stipulated by the parties.

ISSUE 8: Should the docket be closed?

**** SUMMARY OF FPTA'S POSITION:** No position. **

DISCUSSION: FPTA has no position on this issue.

Respectfully submitted,



Angela B. Green
Florida Public Telecommunications
Association, Inc.
125 S. Gadsden St., Suite 200
Tallahassee, Florida 32301
(904) 222-5050

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the Florida Public Telecommunications Association's Post-Hearing Brief was furnished by U.S. Mail this 6th day of November, 1995, to the following parties of record:

Monica Barone, Esquire
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0863

F. Ben Poag
Sprint/United Florida
Sprint/Centel Florida
P.O. Box 2214
Tallahassee, FL 32316

Nancy Sims
Southern Bell
150 S. Monroe St., #400
Tallahassee, FL 32301

Timothy Devine
MFS Communications Co., Inc.
6 Century Drive, Suite 300
Parsippany, New Jersey 07054

C. Everett Boyd, Jr., Esquire
Ervin, Varn, Jacobs, Odom & Ervin
P.O. Drawer 1170
Tallahassee, Florida 32302

Michael W. Tye, Esquire
106 East College Ave., Suite 1410
Tallahassee, Florida 32301

Bev Menard
c/o Richard Fletcher
GTE Florida, Inc.
106 E. College Ave., Suite 1440
Tallahassee, Florida 32301-7704

Richard M. Rindler, Esquire
James C. Falvey, Esquire
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Floyd Self, Esquire
Messer, Caparello, Madsen,
Goldman & Metz
P.O. Box 1876
Tallahassee, Florida 32302

Tony H. Key, Director
State Regulatory - South
Sprint Communications
3100 Cumberland Circle
Atlanta, Georgia 30339

Laura Wilson, Esquire
Charles F. Dudley, Esquire
FCTA, Inc.
310 North Monroe Street
Tallahassee, Florida 32301

Jill Butler
Digital Media Partners/Time
Warner Communications
2773 Red Maple Ridge
Tallahassee, Florida 32301

Office of Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Robin D. Dunson, Esquire
1200 Peachtree St., N.E.
Promenade I, Room 4038
Atlanta, Georgia 30309

William Higgins
Cellular One
250 S. Australia Ave.
West Palm Beach, FL 33401

FIXCA
JP Gillan & Associates
P.O. Box 541038
Orlando, Florida 32854-1038

Peter Dunbar, Esquire
Pennington Law Firm
P.O. Box 10095
Tallahassee, Florida 32302

Michael J. Henry, Esquire
MCI Telecommunications Corp.
780 Johnson Ferry Rd.
Suite 700
Atlanta, Georgia 30342

Richard D. Melson, Esquire
Hopping, Green, Sams & Smith
P.O. Box 6526
Tallahassee, Florida 32314

St. Joseph T & T Co.
P.O. Box 220
Port St. Joe, Florida 32456

Gulf Telephone Company
P.O. Box 1120
Perry, FL 32347-1120

Floral Telephone Company
P.O. Box 186
Floral, AL 36442-0186

Northeast Florida Telephone
Company, Inc.
P.O. Box 485
Macclenny, Florida 32063-0485

Vista United Telecommunications
P.O. Box 10180
Lake Buena Vista, Florida 32830

ALLTEL Florida, Inc.
P.O. Box 550
Live Oak, Florida 32060-0550

Indiantown Telephone System, Inc.
P.O. Box 277
Indiantown, Florida 34956

Frontier Telephone Co.
P.O. Box 37
Atmore, Alabama 36504-0037

Quincy Telephone Co.
P.O. Box 189
Quincy, Florida 32351


BY: ANGELA B. GREEN