

J. Phillip Carver
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March 25, 1996

**ORIGINAL
FILE COPY**

Ms. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Rm. 110
Tallahassee, Florida 32399-0850

RE: DOCKET NO. 930173-TL
POLO PARK EXCHANGE EAS

Dear Mrs. Bayó:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications Inc.'s Prehearing Statement, which we ask that you file in the captioned docket.

A 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 to the parties shown on the attached Certificate of Service.

Sincerely yours,

J. Phillip Carver
J. Phillip Carver (M)

- ACK
- AFA _____
- APP _____
- CAF _____
- GMU _____
- CTR _____
- EAG _____
- LEG 1
- LIN 5
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Enclosures

cc: All Parties of Record
R. G. Beatty
A. M. Lombardo
R. Douglas Lackey

RECEIVED & FILED
EPSO BUREAU OF RECORDS

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03508 MAR 25 96

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CERTIFICATE OF SERVICE
Docket No. 930173-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by U.S. Mail this 25th day of March, 1996 to:

J. Adams
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
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Tallahassee, FL 32399-0850

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J. Phillip Carver
J. Phillip Carver (PC)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by the residents)
of Polo Park requesting extended)
area service (EAS) between the)
Haines City exchange and the)
Orlando, West Kissimmee, Lake)
Buena Vista, Windermere, Reedy)
Creek, Winter park, Clermont,)
Winter Garden, and St. Cloud)
exchanges.)

Docket No. 930173-TL

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FILE COPY

Filed: March 25, 1996

**BELLSOUTH TELECOMMUNICATIONS, INC.
PREHEARING STATEMENT**

BellSouth Telecommunications, Inc., in compliance with Order No. PSC-96-0093-PCO-TL, issued January 18, 1996, hereby submits its Prehearing Statement:

A. Witnesses

BellSouth intends to call the following witness to offer testimony on the issues indicated below:

<u>Witness</u>	<u>Issues Addressed</u>
Joseph A. Stanley, Jr.	All issues.

BellSouth reserves the right to call rebuttal witnesses, witnesses to respond to Commission inquiries not addressed through direct testimony and witnesses to address issues not presently designated, which may be designated at the prehearing conference to be held on May 31, 1996, or thereafter by the Prehearing Officer.

B. EXHIBITS

BellSouth has no exhibits at this time. BellSouth, however reserves the right to file exhibits to any additional testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for

DOCUMENT NUMBER-DATE

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cross examination, impeachment, or any other purpose authorized by the Florida Rules of Evidence and the Rules of this Commission.

C. STATEMENT OF BASIC POSITION

The only route at issue in this docket that involves a BellSouth exchange is Haines City to Orlando; Orlando is a BellSouth exchange. Because this is an interLATA route, BellSouth has no traffic data. Without this data, BellSouth cannot take a position as to whether a sufficient community of interest exists to justify non-optional flat rate extended area service. BellSouth believes that if the Florida Public Service Commission ("Commission") determines that an alternative toll plan is appropriate, then the modified ECS (MECS) plan discussed in the Staff Workshop held on January 23, 1996 is the best alternative.

D. BELLSOUTH'S POSITION ON THE ISSUE

Issue 1: Is there a sufficient community of interest from the Groveland exchange to the Orlando, Winter Garden, and Windermere exchanges to justify surveying for nonoptional extended area service as currently defined in the Commission rules, or implementing an alternative interLATA toll plan?

Position: BellSouth has no position as to whether non-optional, flat rate EAS is appropriate. In the absence of traffic data, BellSouth can reach no conclusion as to whether a community of interest exists. If the Commission orders an alternative plan, BellSouth believes that the MECS Plan would be the most appropriate alternative.

Issue 2: What other community of interest factors should be considered in determining if either an optional or nonoptional toll alternative should be implemented on these routes?

Position: BellSouth has no position.

Issue 3: If a sufficient community of interest is found on any of these routes, what is the economic impact of each plan on the customer and the company (summarize in chart form and discuss in detail)?

- a) EAS with 25/25 plan and regrouping;
- b) InterLATA toll alternative plan; and
- c) Other (specify)

Position: Each plan would have some economic impact on BellSouth because the company would have to incur costs to provide facilities to implement any plan. BellSouth does not, however, have the data necessary to quantify these costs.

Issue 4: Should subscribers be required to pay an additive as a prerequisite to surveying for extended area service or an alternative interLATA toll plan? If so, how much of a payment is required and how long should it last?

Position: BellSouth has no position.

Issue 5: If a sufficient community of interest is found, what are the appropriate rates and charges for the plan to be implemented on these routes?

Position: BellSouth has no position.

Issue 6: If extended area service or alternative interLATA toll plan is determined to be appropriate, should the customers be surveyed?

Position: Yes. Customers should be surveyed regarding any proposed plan.

E. STIPULATIONS

BellSouth is not aware of any stipulations between the parties in this proceeding.

F. PENDING MOTIONS FILED BY BellSouth

There are no currently pending motions filed by BellSouth.

G. OTHER REQUIREMENTS

BellSouth knows of no requirement set forth in the Prehearing Order with which it cannot comply.

Respectfully submitted this 25th day of March, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty

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