

J. Phillip Carver
General Attorney

BellSouth Telecommunications, Inc.
c/o Nancy H. Sims
Suite 400
150 So. Monroe Street
Tallahassee, Florida 32301
Telephone 305 347 5558

FILED
MAY 28 1996

May 28, 1996

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. 941281-TL
Groveland Exchange EAS

Dear Mrs. Bayó:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications Inc.'s Post Hearing Statement of Issues and Positions, 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 (AW)

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU *Sheffer* _____
- CTR _____
- EAG _____
- LEG 1 _____
- LIP 3 _____
- OPC _____
- REL _____
- SL 1 _____
- WAS _____

Enclosures

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

RECEIVED & FILED
MAY 28 1996
OFFICE OF RECORDS

DOCUMENT NUMBER-DATE
05869 MAY 28 96
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
DOCKET NO. 941281-TL

I HEREBY CERTIFY that a true and correct copy of the
foregoing was served by U.S. Mail this 28th day of May, 1996
to the following:

Donna Canzano
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Alan N. Berg
Senior Attorney
United Telephone Co. of Florida
Post Office Box 5000
Altamonte Spgs, FL 32715-5000

J. Phillip Carver
J. Phillip Carver

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by subscribers)
of the Groveland exchange for)
extended area service (EAS) to)
the Orlando, Winter Garden, and)
Windermere exchanges.)
_____)

Docket No. 941281-TL

Filed: May 28, 1996

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
POST HEARING STATEMENT OF ISSUES AND POSITIONS**

BellSouth Telecommunications, Inc. ("BellSouth or Company"), hereby files, pursuant to Rule 25-22.056(3), Florida Administrative Code, its Post Hearing statement of Issues and Positions and states the following:

BellSouth has taken no position on most of the issues in this docket for two reasons: 1) the only route at issue in this docket that involves a BellSouth exchange is Groveland to Orlando (Orlando is a BellSouth exchange); 2) because the Groveland to Orlando route is interLATA, BellSouth has no data regarding the traffic over this route. Without traffic data, BellSouth is unable to determine whether a sufficient community of interest exists on this route to justify non-optional, flat rate extended area service. Accordingly, BellSouth has taken no position as to whether extended area service ("EAS") is appropriate.

BellSouth does believe, however, that if the Florida Public Service Commission ("Commission") determines that an alternative toll plan is appropriate, then the modified ECS (MECS) plan is the

DOCUMENT NUMBER-DATE

05869 MAY 28 8

FPSC-RECORDS/REPORTING

best alternative. Further, customers should be surveyed regarding any plan that is proposed.

In addition to the foregoing, BellSouth states, pursuant to Rule 25-22.056(3)(a), the following as its specific positions on the issues that have been identified for resolution in this docket.

BELLSOUTH'S POSITION ON THE IDENTIFIED ISSUES

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 pertinent traffic data and can, therefore, take no position as to whether a community of interest exists to justify surveying for non-optional flat rate EAS. If the Commission orders an alternative plan, the MECS Plan is the most appropriate.

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 an economic impact on BellSouth because the company would have to incur costs to provide facilities to implement any given 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 an alternative interLATA toll plan is determined to be appropriate, should the customers be surveyed?

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

Respectfully submitted this 28th day of May, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.


ROBERT G. BEATTY
J. PHILLIP CARVER
c/o Nancy H. Sims
150 South Monroe St., Room 400
Tallahassee, FL 32301
(305) 347-5555