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BellSouth Telecommunications, Inc.
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September 10, 1996

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

961074-TL

Re: Petition for Waiver - Line Concentration

Dear Mrs. Bayó:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s Petition for Waiver, 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,

J. Phillip Carver (BL)
J. Phillip Carver

Enclosures

cc: All Parties of Record
R. G. Beatty
A. M. Lombardo
William J. Ellenberg II

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09619 SEP 10 96

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
DOCKET NO. _____

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.
Mail this 10th day of September, 1996 to:

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Betty Easley Conference Center, Rm. 110
Tallahassee, FL 32399-0850

J. Phillip Carver (BT)
J. Phillip Carver

DOCUMENT NUMBER-DATE
09619 SEP 10 8
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of BellSouth
Telecommunications, Inc.)
for Waiver of Rule 25-24.515(9))
regarding line concentration)
_____)

Docket No. _____

Filed: September 10, 1996

PETITION FOR WAIVER

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.036, Florida Administrative Code, petitions the Florida Public Service Commission (the "Commission") for a waiver of Rule 25-24.515(9), Florida Administrative Code, to allow BellSouth to concentrate access line service for inmate facilities. This waiver request would allow concentration of up to a maximum of three instruments to one line for coinless pay telephone services located in confinement facilities within the state of Florida. As grounds in support of this Petition, BellSouth states as follows:

1. BellSouth is a telephone company lawfully doing business in the State of Florida, the regulated operations of which are subject to the Commission pursuant to Chapter 364, Fla. Stat., and is certificated to provide pay telephone services both within the area in which it provides local exchange service in Florida and outside that area.
2. BellSouth's principal place of business in Florida is 150 W. Flagler Street, Suite 1910, Miami, Florida 33130.

DOCUMENT NUMBER-DATE

09619 SEP 10 96

FPSC-RECORDS/REPORTING

3. Pleadings and process in this matter may be served upon

Robert G. Beatty
Phillip Carver
Stephen M. Klimacek
c/o Nancy Sims
BellSouth Telecommunications, Inc.
W. Monroe Street, Suite 400
Tallahassee, FL 32301

4. BellSouth currently provides coinless pay telephone services to confinement facilities.

5. Pursuant to Rule 25-24.515(9), BellSouth must connect its telephone station as required by the pay telephone access tariff of the local exchange company. By way of example, paragraph A7.3.1e of the General Services Tariff of GTE of Florida states as follows: "A subscriber must use a separate Public Telephone Access Line for each CPE public telephone installed"

6. Inmate equipment available to payphone service providers allows a provider to configure the inmate payphone system according to the needs of the facility administrator and according to the accessibility to the payphones by resident inmates. In those instances where the administrator exercises his ability to control access to the payphones or rotates access through cell blocks at different times of day, concentration allows the payphone provider and facility administrator to utilize fewer lines to provide dial tone to different phones at different times; i.e., so that there is dial tone only at the phones that are accessible at any given time.

7. Traffic engineering can ensure that access can be provided to those inmates who have access to the payphones when and where it is needed without

the additional expense and regulatory constraint required by one to one access lines.

8. Because of this unique ability to control access to payphones in jails, prisons or correctional facilities, and because access to 911 service is denied to the inmates on payphones, concentration is appropriate in this environment.

WHEREFORE, BellSouth respectfully requests that it be granted a waiver of the applicable rules and orders currently prohibiting concentration of access line services for calls made from its pay telephones located in confinement facilities.

Respectfully submitted this 10th day of September, 1996.

BellSouth Telecommunications, Inc.

Robert G. Beatty (BL)

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