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September 20, 1996

BY HAND DELIVERY

Ms. Blanca Bayo, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 920260-TL

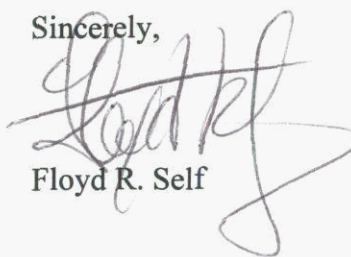
Dear Ms. Bayo:

Enclosed are an original and fifteen copies of the Prehearing Statement of AT&T Wireless Services of Florida, Inc. in the above- referenced docket. Also enclosed is a diskette with the document on it in WordPerfect 6.0/6.1 format.

Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

Thank you for your assistance in this matter.

Sincerely,



Floyd R. Self

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

ERS/amb
Enclosures

cc: William H. Higgins, Esq.
Parties of Record

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10077 SEP 20 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone and Telegraph)
Company)
_____)

Docket No. 920260-TL
Filed: September 20, 1996

**PREHEARING STATEMENT OF
AT&T WIRELESS SERVICES OF FLORIDA, INC.**

AT&T Wireless Services of Florida, Inc. ("AWS"), f/k/a McCaw Communications of Florida, Inc. on behalf of itself and its Florida regional affiliates, through undersigned counsel, respectfully submits its prehearing statement.

A. APPEARANCES

Floyd R. Self, Esq. and Norman H. Horton, Jr., Esq.
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Post Office Box 1876
Tallahassee, FL 32302-1876

On behalf of AT&T Wireless Services of Florida, Inc.

B. WITNESSES

<u>Witness</u>	<u>Issues</u>
Kurt C. Maass,	
Direct	Issues 1 and 2
Rebuttal	Issues 1 and 2

C. EXHIBITS

AWS does not intend to present any exhibits, but reserves the right to introduce exhibits, if necessary, as may be required by cross examination, later filed testimony, completion of discovery, or new issues identified at the prehearing conference.

D. BASIC POSITION

The Joint Proposal filed by Florida Ad Hoc, AT&T, MCI, Sprint and AWS should be approved as the best use for this final, unspecified rate reduction. The alternative proposals of BellSouth, Public Counsel, FCTA and Palm Beach Newspapers should be rejected.

E. ISSUES AND POSITIONS

ISSUE 1: Below are listed the proposals of various interested parties to this proceeding with respect to the disposition of the scheduled 1996 unspecified rate reductions.

Which, if any, should be approve?

A)	BellSouth Telecommunications, Inc.:	<u>millions</u>
1)	Reduce switched access (introduce zone density)	\$16.40
2)	Reduce PBX rates and introduce term contracts	13.45
3)	Waive certain business and residential Secondary Service Order charges	5.81
4)	Reduce First Line Connection charge (Business)	3.22
5)	Introduce Area Plus for Business	2.25
6)	Eliminate usage charge on Remote Call Forwarding	2.01
7)	Reduce DID recurring and non-recurring charges	1.88
8)	Credit for ECS routes implemented	1.10
9)	Reduce Business Line monthly rates in Rate Group 12	.62
10)	Reduce Megalink interoffice rates	.58
11)	Reduce WATS and 800 Service access line charges	.36
12)	Eliminate the Secondary Service Order charge for WatsSaver	.30
13)	Reduce SNAC charges for Business	.07
14)	Reduce DS-1 interoffice mileage rates	<u>.04</u>
		\$48.09

- B) Joint Proposal of ATT, MCI, Sprint Communications, FIXCA, Ad Hoc and McCaw Communications:**
- | | <u>millions</u> |
|--|-----------------|
| 1) Reduce PBX and DID trunk charges | \$11.00 |
| 2) Eliminate the Residual Interconnection Charge | 35.00 |
| 3) Reduce mobile interconnection rates | <u>2.00</u> |
| | \$48.00 |
- C) Public Counsel:**
Establish a reserve fund to assist BellSouth Telecommunications, Inc. customers who have experienced problems with conversion to the 954 NPA
- D) FCTA:**
Eliminate nonrecurring charges for interconnection trunks and special access circuits ordered by ALECs.
- E) Palm Beach Newspapers, Inc./Florida Today:**
Reduce usage rates for N11 service to \$.02 per minute.

AWS' Position: The Commission should approve the Joint Proposal as it is the only proposal that provides substantial benefits to ratepayers. Intrastate access charges and mobile interconnection rates are priced substantially in excess of cost, and PBX/DID rates are priced significantly higher than the equivalent BellSouth end user service. As monopoly services, movement of these prices closer to cost will maximize the most efficient use of the network and lead to lower rates and new and improved service offerings. Implementation of the BellSouth proposal would likely impair the development of competition. The BellSouth proposals are targeted to unfairly protecting and expanding BellSouth's customer base in the face of competition. As for the other proposals, they are unnecessary and inappropriate at this time given the more important benefits that arise from reducing the rates identified in the Joint Proposal.

ISSUE 2: To the extent the Commission does not approve the plans proposed by BellSouth, Public Counsel, FCTA, Palm Beach Newspapers, Inc./Florida Today and AT&T, MCI, Sprint, FIXCA, Ad Hoc and McCaw, how should the Commission implement the scheduled rate reduction?

AWS' Position: These final unspecified rate reductions should be used to address those rate categories where the current price is greatly in excess of cost, there is a competitive inequality between customer service classes, or important policy objectives can be advanced. Thus, funds should not be used to reduce prices already below cost or to give BellSouth a competitive advantage as competition is introduced into the local exchange market.

ISSUE 3: What should be the effective dates of the approved tariffs?

AWS' Position: Tariffs should be filed and implemented as soon as practical, but in no event in more than 30 days from the final order.

F. PENDING MOTIONS FILED BY MCCA W COMMUNICATIONS

AWS has no pending motions at this time.

G. REQUIREMENTS THAT CANNOT BE COMPLIED WITH

AWS knows of no requirements that cannot be complied with.

Dated this 20th day of September, 1996.

Respectfully submitted,
MESSER, CAPARELLO, MADSEN,
GOLDMAN & METZ, P.A.
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FLOYD R. SELF, ESQ.
NORMAN H. HORTON, JR., ESQ.

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Inc. and its Florida regional affiliates

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Prehearing Statement of AT&T Wireless Services of Florida, Inc. in Docket No. 920260-TL has been sent by Hand Delivery (*) and/or U.S. Mail on this 20th day of September, 1996 to the following parties of record:

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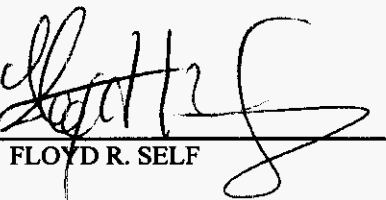
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BY:



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