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October 28, 1996

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

**BY HAND DELIVERY**

961289-TC

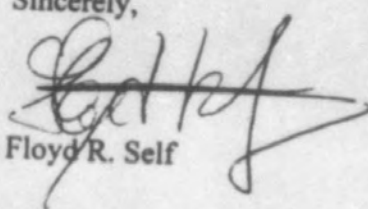
Dear Ms. Bayo:

Enclosed are an original and fifteen copies of Invision Telecom, Inc.'s Petition for Waiver.

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

FRS/amb  
Enclosures

cc: Barry E. Selvidge, Esq.

DOCUMENT NUMBER-DATE

1144 | OCT 28 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for waiver for authorization )  
to utilize line concentration for calls )  
made from pay telephones located in )  
confinement facilities, and for such other )  
relief as may be appropriate, by )  
Invision Telecom, Inc. )  
\_\_\_\_\_ )

Docket No.:  
Filed: October 28, 1996

**PETITION FOR WAIVER**

Pursuant to Commission Rule 25-24.505 (3), Florida Administrative Code, Invision Telecom, Inc., ("Invision") petitions the Florida Public Service Commission ("Commission") for a waiver of those rules and policies currently prohibiting Invision from concentrating access line service for inmate facilities, and to allow concentration of up to a maximum of three instruments to one line, or the equivalent thereof, for pay telephone services located in confinement facilities within the state of Florida. In support of its petition, Invision states:

**INTRODUCTION**

1. Petitioner's complete name and address is:

Invision Telecom Inc.  
2609 Cameron Street  
Mobile, AL 36607

2. All notices, pleadings, orders, and other materials in this docket should be directed to the following on behalf of Invision:

Barry E. Selvidge, Vice President,  
Regulatory Affairs and General  
Counsel  
Invision Telecom, Inc.  
1150 Northmeadow Parkway, Suite 118  
Roswell, GA 30076

Floyd R. Self, Esq.  
Messer, Caparello, Madsen,  
Goldman & Metz, P.A.  
P.O. Box 1876  
Tallahassee, FL 32302-1876

3. Invision is a privately owned corporation authorized to do business in the State of

Florida. Pursuant to Order No. PSC-95-1277-FOF-1C issued October 17, 1995 in Docket No. 940984-TC, Invision provides pay telephone services from confinement facilities located in the state of Florida.

#### **RELIEF REQUESTED**

4. Pursuant to Rule 25-24.505 (3), Florida Administrative Code, Invision is seeking a waiver of Rule 25-24.515 (9). Specifically, Invision seeks authority to provide up to a three to one line concentration, or the equivalent thereof including the option to use alternative interconnection facilities, within inmate facilities for pay telephone service for Invision-provided pay telephone equipment, installed in confinement facilities.

#### **BACKGROUND**

5. Invision currently provides pay telephone services to confinement facilities in Florida.

6. Technology advances in store-and-forward pay telephones and line concentrators have enabled inmate service providers to furnish quality calling services for callers and end users while meeting the unique inmate telephone access and security needs of the confinement facility. This well-developed and proven technology provides reliable call completion, without allowing inmates access to the public telephone network, thus reducing harassment and fraud. Concentration of up to three stations to each service line or service line equivalent, when utilizing T-1 facilities, allows the inmate telephone provider to cost effectively meet the access requirements and to cover a wider range of inmate population concentrations within a specific confinement facility. If more than one instrument occupies a single access line, only one instrument may use the line at a given time. All non-using stations would receive a busy signal until the access line became available. Invision respectfully states that technology advances and regulatory changes that have occurred since

the time this rule was promulgated now make it appropriate for the Commission to grant the limited waiver requested herein.

7. In addition, currently available concentrator equipment will allow access by all stations within the concentrated block of instruments to a series of access lines on a first-available line basis, or to T-1 facilities on a line-equivalent basis, thereby improving the statistical probability of connection to an outside line. The impact of multiple station to single line concentration on the inmate pay telephone service is estimated to be extremely minimal. Since more instruments can be deployed using this configuration, generated revenues for the provider and the facility operator will be improved, as will overall access to telephone service for the inmates.

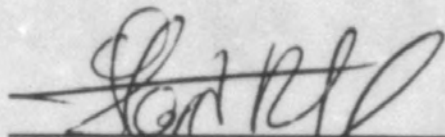
8. Invision seeks to improve its cost-effectiveness and competitive efficiency by providing line concentration of its pay telephones located only in confinement facilities in order to better address the availability, security and control concerns that are paramount in the correctional environment. Invision desires only to do this in confinement facilities and will not use concentration anywhere else. Rule 25-24.515 (15) recognizes that regulatory requirements need to take into account the unique conditions and needs of confinement facilities. No adverse service effects have been observed or reported at those facilities where line concentration has been applied.

9. The Commission's approval of this waiver request is consistent with the legislative mandates to avoid "unnecessary regulatory constraints" and to eliminate rules that "delay or impair the transition to competition." Sections 364.01 (4) (e) and 364.01 (4) (f), Florida Statutes (1995). Furthermore, the Commission, in Order No. PSC-96-1157-FOF-TC, issued September 17, 1996, has already granted a waiver permitting ATN, Inc., to provide up to a three to one line concentration within inmate facilities.

WHEREFORE, INVISION respectfully requests that it be granted a waiver of the applicable rules and orders currently prohibiting concentration of line services for calls made from its pay telephones located in confinement facilities, on a single line or T-1 basic, and for the Commission to take such other relief as is consistent with this petition and the competitive policies embodied in revised chapter 364.

Respectfully submitted, this 28th day of October, 1996.

MESSER, CAPARELLO, MADSEN,  
GOLDMAN & METZ, P.A.  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
(904) 222-0720



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FLOYD R. SELF, ESQ.  
GWEN G. JACOBS, ESQ.

Attorneys for Invision Telecom, Inc.

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FILE COPY

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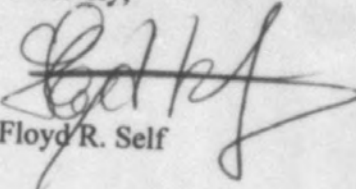
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- ACK \_\_\_\_\_ FRS/amb
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- APP \_\_\_\_\_ cc: Barry E. Selvidge, Esq.
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11441 OCT 28 1996

FPSC-RECORDS/REPORTING

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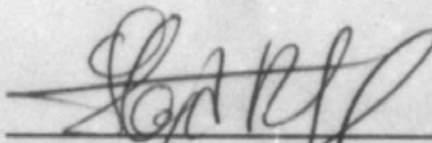
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