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December 9, 1996

HAND DELIVERED

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Re: Docket No. ~~941281-TL~~; In Re: Petition by subscribers of the Groveland exchange for extended area service (EAS) to the Orlando, Winter Garden and Windermere Exchanges.

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and fifteen copies of The Florida Interexchange Carriers Association's Additional Comments in the above docket.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

ACK _____
AFA _____
APP _____
CAF _____
CMU Sheffer
CTR _____
EAG VGK/pw
LEG 1 Encls.
LW 3
OFC _____
RUI _____
SEC 1
WAS _____
OTH _____

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

DOCUMENT NUMBER-DATE

13090 DEC-96

FPSC-RECORDS/REPORTING

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: December 9, 1996
)
)
)

**THE FLORIDA INTEREXCHANGE CARRIERS ASSOCIATION'S
ADDITIONAL COMMENTS**

On November 18, 1996, the Commission Staff held a workshop on the issues related to the provision of EAS and ECS service since the passage of the Telecommunications Act of 1996 (Act). At the conclusion of the workshop, Staff requested additional comments, particularly as to the provision of one-way EAS/ECS, as well as any other comments or suggestions the parties might have. The Florida Interexchange Carriers Association (FIXCA) files its additional comments in response to Staff's request.

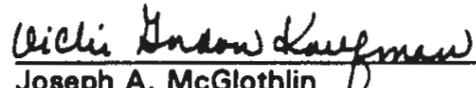
1. As an initial matter, FIXCA adopts and incorporates herein by reference its brief filed on August 29, 1996, in which it briefed in detail the same issues discussed at the November 18 workshop. In summary, it is FIXCA's position that BellSouth Telecommunications, Inc. (BellSouth) cannot originate interLATA traffic at this time; if BellSouth terminates interLATA traffic for another carrier, it must charge that carrier the same thing it would charge an IXC to terminate the call; and the Commission cannot order telecommunications carriers to provide EAS/ECS service.

2. With these principles in mind, FIXCA has the following additional comments. As to one-way EAS, FIXCA is unsure if this "solution" will satisfy consumers. First, one-way EAS is extremely confusing. Two people on the same call

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will pay two different prices; this price difference is difficult for consumers to understand. Such a regime may lead to more discontent and confusion among consumers rather than less. Second, one-way EAS requires that BellSouth charge all carriers (IXC or LEC) the same amount to terminate a call. For example, BellSouth cannot charge Alltel (or any other LEC) a different rate to terminate a call than it charges an IXC.

3. The root of the problem in this (and the other dockets) is not the inability of BellSouth to carry interLATA calls. Nor is it the inability of the Commission to permit LECs to offer "discount" toll plans. Rather, it is the high price of access which the IXCs must pay BellSouth which results in consumers' desire for toll relief. As the evidence showed in Docket No. 920260-TL, BellSouth's access charges are 12 to 15 times greater than BellSouth's cost to provide the service. Only when this problem is remedied will consumers see the kind of toll rate relief they seek.



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Attorneys for the Florida Interexchange
Carriers Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Florida Interexchange Carriers Association's Additional Comments has been furnished by hand delivery (*) or U.S. Mail to each of following parties, this 9th day of December 1996:

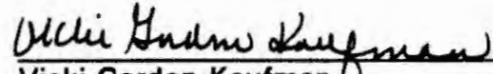
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