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February 21, 1997

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. ~~950099~~-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are 15 copies of the Direct Testimony of R. Earl Poucher on Behalf of the Citizens of the State of Florida.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck
Deputy Public Counsel

CJB:bsr

Enclosure

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Resolution by City)
Commission of Haines City)
Requesting Extended Area)
Service (EAS) from Haines)
City Exchange to all)
Exchanges within Polk)
County.)

Docket No. 950699-TL
Filed: February 21, 1997

DIRECT TESTIMONY OF
R. EARL POUCHER

Respectfully submitted,
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Public Counsel

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Attorney for the Citizens
Of the State of Florida

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1 **Q. Have you ever appeared before this Commission?**

2 **A. Yes I have. I testified on behalf of Public Counsel in United Telephone's Docket**
3 **No. 910980-TL on rate case matters and Docket No. 910725-TL on depreciation**
4 **matters, GTE Docket No. 920188-TL on Inside Wire, in Southern Bell's**
5 **depreciation Docket No. 920385-TL and in Docket No. 951123-TP, a generic**
6 **rulemaking docket dealing with disconnect authority of local exchange**
7 **companies. In addition, as an employee of Southern Bell I testified in rate case**
8 **and anti-trust dockets before the Public Service Commissions in Georgia and**
9 **North Carolina.**

10 **Q. What is the purpose of your testimony?**

11 **A. The purpose of my testimony is first, to describe the community of interest**
12 **standards that are appropriate for consideration of extended area service and**
13 **second, to recommend that the PSC approve toll relief on the routes requested**
14 **by Haines City.**

15 **Q. What actual experiences have you had in the handling of extended area**
16 **services?**

17 **A. As a Legislative Analyst for the Office of Public Counsel, I analyze all of the**
18 **PSC's EAS cases and rulemaking dockets involving EAS and I participate as**
19 **required by the Public Counsel. As an employee of Southern Bell, I spent a**
20 **number of years in various Forecasting and Rate and Tariff organizations within**
21 **the company, where I was frequently involved in various EAS dockets, in both**
22 **Florida and throughout Southern Bell's operating territories. One of my specific**
23 **assignments early in my career with Southern Bell was the production of**
24 **Community of Interest factors for use by the Company and the Commission on**
25 **those major toll routes where EAS was being considered. It was our**

1 responsibility to not only determine the traffic factors involved in EAS cases, but
2 to also develop the relevant demographic factors within the exchanges at issue.
3 As General Rate Administrator in Southern Bell Headquarters, I was frequently
4 involved in the development of EAS policies and the resolution of specific EAS
5 requests.

6 **Q. Why is it appropriate that the Florida Public Service Commission be**
7 **concerned with the provision of extended area service?**

8 **A.** Attachment 1 includes an extended explanation of the concepts regarding
9 exchange planning and consideration of extended area service requests. In a
10 state such as ours that has experienced extensive population growth, it would
11 have been impossible to maintain exchange boundaries as they existed in 1960,
12 for instance, without some modification to recognize growth and expansion of
13 population and commerce. When the communities of interest between two or
14 more separate telephone exchanges begin to merge, the application of high
15 long distance rates becomes more onerous to the consumer body. In response
16 to the expressed needs of local telephone customers for relief from high long
17 distance charges, the Public Service Commission has traditionally implemented
18 a less costly means for delivery of communications that are essentially local in
19 nature.

20 Historically, the approval of extended area service plans between two
21 exchanges have been based on valid community of interest considerations. In
22 some cases, the traffic volume alone has been determined to be sufficient to
23 demonstrate that a community of interest exists and EAS is warranted. In other
24 cases, the Commission has considered demographic data (such as the need for
25 countywide calling or access to schools) in reaching a conclusion that EAS is

1 appropriate.

2 **Q. What are the traffic standards that have been accepted by the Commission**
3 **in determining that a community of interest exists between two**
4 **exchanges?**

5 A. Commission rules require that at least three (3) messages per month (MAM) be
6 originated from an exchange requesting EAS to another exchange before the
7 Commission will require a vote for the provision of flat rate EAS. This is the
8 most common measurement. It applies to one way traffic, normally from a
9 smaller, suburban exchange that would normally be dependent upon a larger
10 exchange for economic support and governmental services.

11 When considering the traffic volumes when exchanges are approximately equal
12 in size, the Commission rules require a threshold level of 2 messages per
13 access line per month on a two way basis before automatically requiring a ballot
14 for EAS.

15 The Commission, however, has waived this threshold level when presented with
16 additional evidence confirming an adequate community of interest to justify the
17 balloting of customers for flat rate EAS between two exchanges.

18 In all cases, the Commission requires that a local petition or a resolution from
19 a governmental body be received before it will implement an EAS docket.

20 **Q. Has the Commission approved any other alternatives to flat rate EAS in the**
21 **past?**

22 A. Yes. The Commission has considered and approved numerous alternatives to
23 flat rate EAS in past years. During the 1970s and the 1980s the Commission
24 approved a large number of optional EAS plans that were implemented when
25 traffic volumes were less than the threshold level for flat rate EAS, or when

1 balloting for flat rate EAS failed on a given route. During the past ten years, the
2 Commission has approved non-optional EAS plans such as the \$.25 Extended
3 Community Service (ECS or \$.25)) plan when demographic community of
4 interest considerations were considered, or when flat rate EAS ballots were
5 rejected. It is generally valid to state that when an exchange generates three
6 or more messages per access line per month to a distant exchange, the
7 Commission considers this level of traffic to be proof, per se, that a valid
8 community of interest exists between the two exchanges to justify relief from
9 long distance rates in the form of non-optional flat rate EAS or an appropriate
10 non-optional EAS plan such as ECS. In addition, where traffic volumes have
11 been found to be less than 3 MAM, the Commission has approved both flat rate
12 EAS offerings and alternative EAS plans, based upon demographic community
13 of interest considerations.

14 According to Commission rules, an exchange must not only exceed the traffic
15 threshold 3 MAM, but also have at least 50% of the customers generating two
16 or more calls per month in order to be considered eligible for a balloting of
17 customers. Frequently, when the distribution of traffic failed to meet the
18 Commission standards, then alternative EAS plans were implemented.

19 **Q. Is it essential that an exchange have 3 MAM per month and an acceptable**
20 **distribution of calls in order for the Commission to approve flat rate EAS ?**

21 **A. No. The Commission has waived the 3 MAM threshold rule and the distribution**
22 **rule in the past by ordering the companies to ballot customers for flat rate EAS**
23 **(See Franklin County EAS, Docket No. 900302-TL) When the Commission has**
24 **waived its rules for flat rate EAS, it has done so due to the demographic**
25 **community of interest factors.**

1 Q. **What are the demographic community of interest factors you have**
2 **mentioned?**

3 A. Community of interest factors are more thoroughly discussed in Attachment 1.
4 The Community of Interest Factors that I would regard as relevant to EAS are
5 as follows:

6 1. **Governmental Services**

7 Access to state and local governmental offices

8 2. **Medical Services**

9 Access to physicians, hospitals, emergency care

10 3. **Professional Services**

11 Access to lawyers, CPAs, architects, etc.

12 4. **Commerce**

13 Level of business interactivity, shopping and other commercial
14 interactions between exchanges

15 5. **Employment**

16 Incidences of major employment in one exchange with employee
17 residences located in another exchange.

18 6. **Transportation**

19 Availability of transportation links that encourage commercial and social
20 interaction between two exchanges

21 7. **Social Interaction**

22 Dependence of one exchange for entertainment and cultural activities
23 available only in a distant exchange

24 8. **Schools**

25 Students whose school is located in an exchange that is not within the

1 student's residential local calling area.

2 9. **Countywide Calling**

3 Increased recognition that county boundaries create a need for local
4 calling between exchanges within the county for a variety of reasons that
5 include many of the preceding factors.

6 10. **Natural Barriers**

7 While the above factors, when considered, are elements that draw two
8 communities together, natural barriers, such as bodies of water, swamps,
9 etc. may tend to separate communities, even though the actual distance
10 between the exchanges may be relatively short

11 No single factor or formula can be identified that would enable regulators to
12 easily determine when there is sufficient community of interest between
13 exchanges to justify EAS. Each case will have a different set of facts
14 Discretion is left to the Commission to implement EAS plans that are consistent
15 with the public interest and non-discriminatory to all users.

16 **Q. Does Haines City have sufficient traffic volumes between the Haines City
17 exchange and the other exchanges in Polk County to warrant balloting for
18 flat rate EAS?**

19 **A.** The traffic volumes and the distribution of messages on the routes between
20 Haines City and its sister cities in Polk County is insufficient, per se, to justify flat
21 rate EAS balloting between Haines City and all of the exchanges in Polk County.
22 However, consistent with the Commission's decision in Franklin County Docket
23 No. 900302-TL, the Commission may be convinced by the non-traffic factors
24 that sufficient community of interest exists to require offering flat rate EAS on all
25 existing countywide routes between Haines City and its sister cities in Polk

1 County.

2 **Q. Are the traffic volumes sufficient to justify an alternative EAS plan between**
3 **Haines City and other exchanges within Polk County?**

4 **A. Yes. Based on past precedent, the traffic between Haines City and other**
5 **exchanges in Polk County is consistent with the traffic in other rural counties**
6 **that has resulted in approval of alternative plans such as ECS or the \$.25 calling**
7 **plan by this Commission.**

8

9 For instance, the Commission ordered the implementation of the \$.25 calling
10 plan for all of Volusia County when many of the routes had less than one
11 message per month per customer.

12 In the Volusia County docket, PSC staff stated,

13 "The remaining routes in the county exhibited one-way calling volumes
14 which are consistent with the other countywide EAS requests...This is
15 consistent with staff's recommendation in several other countywide EAS
16 dockets with rural areas...Recent areas include Franklin, Gulf, Jackson,
17 Holmes, Okaloosa and Walton Counties."

18 **Q. Doesn't the Commission require at least 3 MAM before it implements an**
19 **alternative EAS plan such as ECS?**

20 **A. No. For instance, the Commission approved ECS between two counties--**
21 **Hillsborough and Pinellas--when only two out of 32 routes within the two**
22 **counties had traffic that exceeded 3 MAM. Many of the Tampa Bay routes**
23 **showed little if any levels of traffic.**

24 In another case, the Commission ordered a ballot for flat rate EAS in Franklin
25 County when none of the routes exceeded 3 MAM. Ultimately, when the flat rate

1 ballot failed, the Commission ordered the \$.25 plan for all routes in the county.
2 In the Liberty County docket, the Commission determined that toll rates were
3 inappropriate and the \$.25 calling plan should be implemented with the traffic
4 volumes shown below:

5 ONE WAY MAM

6 Bristol to Eastpoint .39
7 Eastpoint to Bristol .18
8 Hosford to Eastpoint .24
9 Eastpoint to Hosford .06

10 The above routes were approved by the Commission because of the need for
11 countywide calling on the part of a small pocket of 56 subscribers in Sumatra
12 who lived in Liberty County, but were served by Eastpoint, which is located in
13 Franklin County. The Commission, on December 26, 1995, approved the \$.25
14 plan for these routes, even though the traffic from the Sumatra pocket to
15 Hosford was .06 and from Hosford to Sumatra was 1.03 MAM.

16 Likewise, the Commission approved implementation of the \$.25 plan between
17 Sarasota and Englewood in November 1995 due to community of interest
18 factors other than traffic considerations namely, high countywide calling from
19 a Sarasota County pocket of subscribers located in the Englewood exchange.
20 Commission files, which are incomplete due to confidentiality, show that the
21 Commission has approved the offering of the \$.25 plan or other alternative
22 plans in numerous cases where the traffic volumes were less than 3 MAM. In
23 Southern Bell's Docket No. 920260-TL, the Commission approved an ECS
24 offering for 252 exchanges, many of which had less on 1 message per access
25 line per month. Of the original 252 routes proposed by Southern Bell, only

1 relatively few had more than 3 MAM. (See Staff recommendation dated August
2 31, 1995) The Commission, of course, approved its Alternative Staff
3 Recommendation by accepting the Company's ECS filing in the absence of
4 specific, route by route community of interest data.

5 **Q. What is your recommendation for the Commission in this docket?**

6 A. Based on the testimony given by the leaders of Polk County in this docket, the
7 Commission should allow the residents of Polk County to vote for flat rate EAS.
8 In view of the traffic volumes that currently exist between Haines City and its
9 sister cities in Polk County, GTE would probably experience a revenue increase
10 if the ballot should pass, based on the past policies of the Commission of
11 including regrouping revenues and a 25% surcharge above existing local
12 exchange rates when granting an EAS request.

13 **Q. Should the Commission consider offering the \$.25 plan between Haines
14 City and its sister cities in Polk County?**

15 A. Based on the community of interest testimony of the leaders of Polk County, the
16 Commission should require GTE to implement the \$.25 calling plan if it decides
17 not to ballot the customers, or if the ballot fails. As GTE itself said in its Tampa
18 Bay ECS case:

19 "As our society becomes more mobile, expansion of local calling based
20 on traditional point to point calling is no longer practical. People no
21 longer have the same calling needs as their neighbors"

22
23 "With this plan, there are no losers. Customers who make no calls to the
24 ECS exchanges continue to pay their same current monthly local rates."

25

1 In the GTEFL rate case, Docket 920188-TL, GTE proposed countywide calling
2 for all of its counties, including Polk County. The Commission refused to
3 implement the request of GTE, stating "While we have generally responded to
4 countywide needs,... we find a wholesale conversion to countywide calling
5 absent (a governmental request) to be inappropriate."

6 In the current case before the Commission, there is a governmental request. In
7 addition, petitioners are providing substantial, additional testimony
8 demonstrating the community of interest needs that Haines City customers have
9 for communications with their sister cities in Polk County.

10 **Q. Please summarize your testimony.**

11 A. It is clear from past PSC decisions that the Commission regards the need to
12 access other exchanges within county boundaries to be a powerful factor in
13 approval of flat rate EAS or non-optional ECS type plans in lieu of traditional toll
14 rates. The testimony of the public leaders of Polk County should be sufficient
15 to cause the Commission to require GTE to implement either a ballot for flat rate
16 EAS or, at the very least, a non-optional ECS plan just like the current ECS plan
17 that is already in place throughout Tampa Bay.

18 **Q. Does this conclude your testimony?**

19 A. Yes, it does.
20
21
22
23
24
25

DIRECT TESTIMONY
R. EARL POUCHER
FOR
OFFICE OF PUBLIC COUNSEL
BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 950699-TL
EXHIBIT REP-1

**COMMUNITY OF INTEREST STANDARDS
FOR
EXTENDED AREA SERVICE**

By R. Earl Poucher

Office of Public Counsel

The basic planning unit for the design of telephone systems is the exchange service area. The exchange service area has traditionally been utilized by telephone company planners and regulatory agencies to define the serving area for local exchange telephone services that are regulated by state commissions.

In the early days of telephony, manual switchboards were located close to the center of towns and cities and aerial telephone lines were extended to businesses and residents to provide basic telephone service via manual connections. Gradually, the local exchange services were interconnected by long distance services. When local telephony moved from unregulated chaos to regulated monopoly, the concept of the local exchange serving area formed the basis of the regulatory franchise approved by state regulators.

As telephone systems grew, manual switchboards were replaced by mechanical and ultimately electronic switching systems. In the larger towns and cities, it became necessary to install multiple central offices to minimize the cost of distribution cable. However, the local exchange planning concept prevailed. The FPSC rules define exchange as "(t)he entire telephone plant and facilities used in providing telephone service

to subscribers located in an exchange area." (25-4.003(12)). The exchange area is defined as "(t)he territory of a local exchange company within which local telephone service is furnished at the exchange rates applicable within that area." (25-4.003(13))

The concept of extended area service developed even in the early days of telephony as the larger cities began to grow and engulf the surrounding towns. As commerce and social exchanges began to merge between cities due to growth, the cost and inconvenience of long distance calling became unacceptable. The Telecommunications Act of 1934 specifically provided for the regulation of local exchange service by state authority, defining the local exchange as a local exchange service area or an area of connected local exchanges.

Today, local exchange service areas are defined in FPSC rules as "(t)he area within which telephone service is furnished subscribers under a specific schedule of rates and without toll charges. A local exchange telecommunications company's local service area may include one or more exchange areas or portions of exchange areas." (FPSC Rules, Chapter 25-4.003(28)). Exchange areas are defined by meets and bounds are also filed in map format with the Florida Public Service Commission.

From an engineering standpoint, telephone company planners have traditionally developed the fundamental plan for each exchange area that lays out the long range planning concept for switching and distribution within an exchange area. Such long range plans were developed to anticipate future growth and to accommodate the needs of customers for local exchange services as well as the most economical methods to meet the demands of the future for both local and toll services.

In developing the long range engineering plans for an exchange service area, telephone company engineers consult with their forecasting counterparts to identify future growth that will occur. For instance, a major new subdivision may be planned for an undeveloped area that is served by two separate exchanges. Well in advance of development, telephone company forecasters identify the anticipated community of interest between the residents of the new development and the two separate exchanges and exchange boundaries will be modified to most appropriately serve the communications needs of the new development. Long range fundamental plans are continuously modified to achieve the best balance between economical provision of services and accommodation of the community of interest needs of customers.

As commerce and social interaction between two separate exchanges grows over time, long distance calling volumes traditionally increase. The demands for extended area

services between exchanges has been substantial in Florida, due to its high rate of growth. The Florida Public Service Commission has developed, out of necessity, standards to gauge the community of interest between exchanges and has established extensive rules to deal with the numerous appeals for relief from long distance charges by implementation of extended area service (EAS).

Basically, when calling volumes exceed three calls per month per customer (access line), the PSC has determined that the companies should be required to allow customers to vote for or against EAS, providing that at least half of the customers make two or more calls per month. Flat rate EAS usually requires an additional monthly charge for regrouping the smaller exchange to the level of rates applicable in the larger exchange. In addition, the Commission, in recent years, has applied a 25% surcharge for the smaller exchange in order to compensate the company for its lost toll revenue.

In a number of cases in recent years, the Commission has ordered ballots for EAS that have failed to pass the standards established by the Commission for implementation of flat rate EAS. In the majority of cases, the Commission has ordered implementation of a \$.25 calling plan, which provides substantial reductions from existing toll rates. In the case of the Tampa Bay area, the Commission ordered implementation of a \$.25 calling plan in

response to the substantial community of interest between Hillsborough and Pinellas Counties.

When calling volumes are less than the threshold levels adopted by the PSC for flat rate EAS, the Commission has frequently ordered special toll plans or local calling plans in order to respond to the community of interest needs of the area. The existence of a high calling volume (over 3 MAM) is proof per se of a community of interest. However, the Commission has also considered other factors in responding to requests for relief from high toll rates. Some of those additional factors, other than traffic volumes, are as follows:

COMMUNITY OF INTEREST FACTORS

1. Governmental Services When the county seat is located in a distant exchange where toll rates apply, it is burdensome on the citizens to seek state and local governmental services by having to resort to long distance calling.

2. Medical Services When a smaller exchange lacks medical services, including doctors, emergency centers and/or hospitals, it is a significant burden to many citizens to be required to resort to toll services.

3. Professional Services Many smaller exchanges lack professional services (lawyers, CPAs, architects, etc.) which may be located in a nearby major city. If toll rates apply, there is a subsequent burden that can be alleviated through EAS.

4. Commerce Many smaller towns are lacking in adequate choices for normal, day-to-day business and commerce, thus requiring local businesses and residents to resort to long distance calling to satisfy basic, daily needs.

5. Employment Many smaller towns lack employment opportunities, thus requiring many local residents to commute to nearby cities for employment. When EAS is not furnished between such exchanges, even a call from a spouse to pick up a loaf of bread on the way home requires a long distance call. The employment factor is a greater burden when a major regional employer is located in the distant city, thus requiring a substantial percentage of small town residents to travel across exchange boundaries in order to seek employment. A good example of this is the state government in Tallahassee that draws its workforce from a wide geographical area in the Panhandle.

6. Transportation Geographical distances between exchanges can be narrowed when major transportation facilities such as interstate highways connect smaller exchanges.

Improved transportation facilities often result in increased commerce and social interaction between exchanges.

7. Social Interaction Many central cities enjoy the benefits of cultural and social opportunities that are lacking in surrounding small towns. The requirement for long distance calling between exchanges is a barrier to such interaction. Access to museums, movie theaters, football stadiums, good restaurants, parks and libraries is often available for small town residents in nearby cities. Long distance charges are a barrier and a burden for many small town residents who look to nearby cities for other than their basic needs.

8. Schools One of the major problems created by the absence of EAS are created when students attend schools located in one exchange while living in a different exchange where EAS is not provided. In these cases, the application of long distance charges has been identified as a major barrier to communications between students and their friends, between teachers and parents, and between students while attending school and their parents.

9. Countywide Calling The Public Service Commission and the State Legislature has, in the past, attempted to develop countywide calling plans because of the numerous

problems encountered by county residents who receive local telephone service that does not include access to all other portions of the county without the application of toll charges. Countywide calling has been ordered in a number of Florida counties. Some of the plans have included flat rate EAS, while other plans approved by the Commission have included the \$.25 calling plan.

10. Natural Barriers Distance is considered a barrier to communications and, thus, the need or justification for EAS. However, in the case of the Florida Keys, the Commission approved a \$.25 calling plan from the entire Florida Keys, including Key West, to Miami, because of the high calling rate (and, therefore, community of interest) between the Keys and the Miami Exchange.

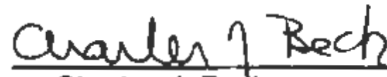
In other cases, natural barriers, such as lakes, bays, rivers, swamps, etc. can create such an obstacle as to negate development of a substantial community of interest, even though the mileage between the two exchanges may be less than between other exchanges that have been afforded EAS in the past.

In summary, no single factor or formula can be identified that would enable regulators or telephone company planners to provide flat rate EAS or other reduced rate calling

plans between telephone exchanges. Absent a sufficient community of interest that needs to be quantified based upon some or all of the above factors, the companies and the Public Service Commission are obligated to provide toll services between separate exchanges in the State of Florida. Upon a finding that a sufficient community of interest exists, then the Commission may order lower rates between the two communities without being subject to a charge that the lower rates are discriminatory or preferential.

**CERTIFICATE OF SERVICE
DOCKET NO. 950899-TL**

I HEREBY CERTIFY that a copy of the Direct Testimony of R. Earl Poucher on behalf of the Citizens of the State of Florida has been furnished by U.S. Mail or hand-delivery to the following parties on this 21st day of February, 1997.



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