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March 21, 1997

**BY HAND DELIVERY**

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

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

Dear Ms. Bayo:

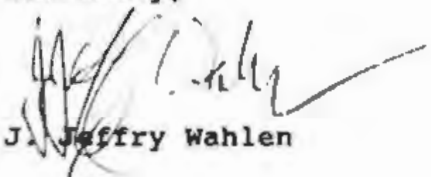
Enclosed for filing in the above-referenced is the original and fifteen (15) copies of Sprint-Florida, Inc.'s Prehearing Statement

We are also submitting the Prehearing Statement on a 3.5" high-density diskette generated on a DOS computer in WordPerfect 5.1 format.


Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

  
J. Jeffrey Wahlen

- ACK
- AFA
- APP
- CAF
- CMU**  *Shelton*
- CTR  JJW/bjm
- EAG  Enclosures
- LEG  cc: All Parties of Record
- LIN  3
- OPC
- RCH
- SEC
- WAS
- OTH

RECEIVED & FILED  
  
FPSC-BUREAU OF RECORDS

DOCUMENT # 95-03A E  
03016 MAR 21 1997  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution by City Commission ) DOCKET NO. 950699-TL  
of Haines City requesting extended area ) Filed: 3/21/97  
service (EAS) from Haines City exchange )  
to all exchanges within Polk County )  
\_\_\_\_\_ )

**PREHEARING STATEMENT  
OF SPRINT-FLORIDA, INC.**

Sprint-Florida, Inc. ("Sprint"), through its undersigned counsel, files this its Prehearing Statement.

- A. **WITNESS:** Sprint will sponsor the prepared Direct Testimony of Sharon E. Harrell
- B. **EXHIBITS:** Ms. Harrell's testimony includes one exhibit (SEH-1), which is confidential.
- C. **BASIC POSITION:** Sprint's basic position is that the calling patterns on the route in this docket involving a Sprint exchange do not meet the Commission requirements to qualify for balloting for flat-rate, nonoptional EAS, nor are they close enough to warrant any alternative form of toll relief.

**D-G. ISSUES AND POSITIONS:**

**ISSUE 1:** Is there a sufficient community of interest to justify implementing EAS as currently defined in the Commission rules, or implementing an alternative toll proposal on any of the following routes:

Haines City/Lakeland\*\*  
Haines City/Polk City  
Haines City/Bartow\*  
Haines City/Mulberry  
Haines City/Frostproof  
Haines City/Indian Lake.

\*County seat of Polk County

\*\*State and Federal offices serving the area

**POSITION:** No. Commission Rule 25-4.060(3) states that a sufficient community of interest exists when the calling rate exceeds three Messages per Access Line per Month (M/A/Ms) and 50% of the

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FPSC-RECORDS/REPORTING

subscribers in the exchange make two or more calls per month. Traffic on the Haines City/Fort Meade route, which is the only route involving a Sprint exchange, does not meet either criteria.

**ISSUE 2:** What other community of interest factors, if any, can or should be considered in determining if either EAS or an alternative toll plan should be implemented?

**POSITION:** Additional community of interest factors often included are the location of schools, fire/police departments, medical/emergency facilities and county governments. The Fort Meade exchange currently has FAS to Bartow, which is the County Seat, and Lakeland, where the State and Federal Offices serving this area are located. Schools and medical facilities are also located within the Fort Meade Exchange, therefore, these traditional community of interest factors are not applicable to this route.

**ISSUE 3:** If a sufficient community of interest is found on any of these routes, what is the economic impact of each plan on the customer and the company (summarize in chart form and discuss in detail)?

- a) EAS with 25/25 plan and regrouping
- b) Alternative toll plan: and
- c) ECS; and
- d) Other (specify)

**POSITION:**

a) Should the Commission determine that flat-rate, nonoptional EAS is warranted, the Fort Meade Exchange would be regrouped from Rate Group 3 to Rate Group 4, thus incurring an increase in their basic local service rate.

b) The impact to the Company would result in a loss of access revenue and an increase in local service revenues, resulting in an estimated annual revenue gain of \$132,000, which does not

reflect the additional costs incurred for facilities that will need to be installed or leased from an IXC, or other administrative costs.

c) The implementation of ECS impacts only those customers making the calls. Based on the monthly calling volume reflected in the traffic studies, the estimated annual revenue impact to the Company would be a loss of \$5,400. These dollars do not reflect the additional costs incurred for facilities that will need to be installed or leased from an IXC, or other administrative costs.

**ISSUE 4:** Should subscribers be required to pay an additive at a prerequisite to implementation of EAS? If so, how much of a payment is required and how long should it last?

**POSITION:** The Haines City/Fort Meade route does not meet the Commission requirements for any form of toll relief. However, should the Commission determine that EAS is appropriate, the 25/25 Plan with Regrouping should be ordered.

**ISSUE 5:** If a sufficient community of interest is found, what are the appropriate rates and charges for the plan to be implemented on these routes or route?

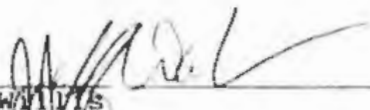
**POSITION:** If the Commission finds that a sufficient community of interest exists, Extended Calling Service should be ordered.

H. **STIPULATIONS:** Sprint is not aware of any pending stipulations at this time.

I. **PENDING MOTIONS:** Sprint's Request for Confidential Classification and Motion for Protective Order dated February 20, 1997 are pending at this time.

**J. COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE:** The Company does not know of any requirement of the Order on Prehearing Procedure with which it cannot comply.

DATED this 21st day of March, 1997.

  
\_\_\_\_\_  
Lee L. Williams  
J. Jeffrey Mahlen  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, FL 32302

ATTORNEYS FOR SPRINT-FLORIDA, INC.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and copy of the foregoing Prehearing Statement has been furnished by U. S. Mail this 21st day of March, 1997 to the following:

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ATTORNEY

\*Hand Delivery

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