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March 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. ~~950399~~-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of the Citizens' Prehearing Statement. A diskette in WordPerfect 6.1 is also submitted.

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

- ACK
- AFA
- APP
- CAF
- CMU *Shelley*
- CTR CJB:bsr
- EAG
- LEG Enclosures
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-GATE

03030 MAR 21 5

FPSC-RECORDS/REPORTING

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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: March 21, 1997

CITIZENS' PREHEARING STATEMENT

In accordance with Commission Order PSC-96-1034-PCO-TL issued August 8, 1996, the Citizens of Florida, by and through Jack Shreve, Public Counsel, file this Prehearing Statement.

1. **All Known Witnesses**

The Citizens filed direct and rebuttal testimony by Mr. R. Earl Poucher. Mr. Poucher addresses the criteria used by the Commission in EAS cases and applies those criteria to the routes at issue in this docket.

2. **All Known Exhibits**

Exhibit REP-1 accompanies the Direct Testimony of R. Earl Poucher, and exhibits REP-2 through REP-19 accompany the rebuttal testimony of R. Earl Poucher. The exhibits are as follows:

DOCUMENT # 950699-DATE
03030 MAR 21 97
FPSC-RECORDS/REPORTING

- REP-1 Community of Interest Standards for Extended Area Service
- REP-2 Holmes, Jackson, Okaloosa Walton County ECS
- REP-3 Franklin County EAS/ECS
- REP-4 Mount Dora ECS
- REP-5 Gilchrist County ECS
- REP-6 Gulf County ECS
- REP-7 Bradford County ECS
- REP-8 Glendale/Paxton ECS
- REP-9 Putnam County ECS
- REP-10 St. Johns County ECS
- REP-11 St. Augustine / Green Cove Springs ECS
- REP-12 Levy County ECS
- REP-13 Vernon / Bonifay / Westville ECS
- REP-14 Pocket Area Dockets
- REP-14A Liberty County Dockets
- REP-15 ECS is Most Appropriate
- REP-16 ECS is Best Alternative
- REP-17 Tampa Bay ECS
- REP-18 PSC Countywide Decision
- REP-19 ECS is Best Method

3. **Statement of Basic Position**

A vote should be conducted to determine whether EAS should be ordered on the routes at issue in this docket. If the vote fails, ECS calling should be implemented.

4. **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 ECS, or 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 Lakes
Haines City/Fort Meade

* County seat of Polk County

** State and Federal offices serving the area

Citizens' Position: There is a sufficient community of interest to warrant a vote on EAS for each of the routes. If the vote fails, ECS should be implemented on each of the routes.

Issue 2. What other community of interest factors should be considered in determining if either EAS, ECS, or an alternative toll plan should be implemented?

Citizens' Position: Yes, there are other community of interest factors. Exhibit REP-1 sets forth ten specific community of interest factors: (1) Governmental Services, (2) Medical Services, (3) Professional Services, (4) Commerce, (5) Employment, (6) Transportation, (7) Social Interaction, (8) Schools, (9) Countywide Calling, and (10) Natural Barriers.

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 for . . . and discuss in detail)?

- A) EAS with 25/25 plan and regrouping
- B) Alternative toll plan
- C) ECS; and
- D) Other (specify)

Citizens' Position: Existing toll rates inhibits economic development along the routes. EAS or ECS will have a positive economic impact on the community.

Issue 4. Should subscribers be required to pay an additive as a prerequisite to implementation of EAS? If so, how much of a payment is required and how long should it last?

Citizens' Position: The Commission should put the 25/25 plan to a vote.

Any increase should last no more than 4 years.

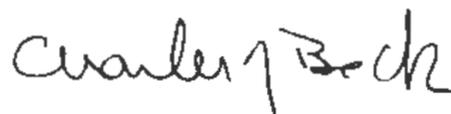
Issue 5. If a sufficient community of interest is found, what are the appropriate rates and charges for the plan to be implemented on these routes or route?

Citizens' Position: The 25/25 plan for EAS can be calculated from existing rates. ECS would not change local rates.

5. Other Matters

There are no pending motions by the Citizens, and no issues have been stipulated. There are no requirements set forth in the order establishing procedure that cannot be complied with.

Respectfully submitted,



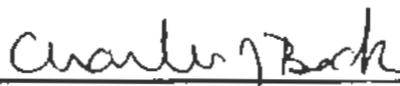
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Attorney for the Citizens
of the State of Florida

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

I HEREBY CERTIFY that a copy of the foregoing 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 March, 1997.


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