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JACK SHREVE  
PUBLIC COUNSEL

STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, Florida 32399-1400  
904-488-9330

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. 950699-TL

Dear Ms. Bayo:

At the request of the City of Haines City, I am filing their prehearing statement in this case for them. A diskette in WordPerfect 6.1 is also submitted.

Please indicate the time and date of receipt on the enclosed duplicate of this letter.

Sincerely,

*Charles J. Beck*  
Charles J. Beck  
Deputy Public Counsel

ACK

AFA

APP  CJB:bsr

CAF

CMD  Enclosures

CTR

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FPSC-RECORDS/REPORTING

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

**PREHEARING STATEMENT OF HAINES CITY**

In accordance with Commission Order PSC-96-1034-PCO-TL issued August 8, 1996, the City of Haines City files this Prehearing Statement.

1. **All Known Witnesses**

The City of Haines City filed direct testimony by the following witnesses:

James C. Brantley, Executive Director of the East Polk County Committee of 100. Mr. Brantley addresses economic growth of the Northeast Polk County area, impact of countywide extended area service on existing and potential businesses and community of interest.

George H. Carefoot, President of First National Bank of Polk County. Mr. Carefoot addresses growth of the Haines City area, impact of countywide extended area service on businesses and additional factors effecting community of interest.

James J. DeGennaro, Senior Vice President of the Central Florida

Development Council. Mr. DeGennaro will address business recruitment and retention, impact of countywide extended area service and additional factors for consideration regarding community of interest.

Jim Nelson. Member of Polk County School Board elected countywide and manage of Haines City Publix Supermarket. Mr Nelson will discuss his experience in public service and the impact of countywide extended area service on business, employment and obtaining county, state and federal services.

Ben Saag. Assistant to the City Manager and Main Street Director for the City of Haines City. Mr. Saag will discuss his role in the local business community and the negative concerns and problems created by lack of countywide extended area service as well as the positive impact that implementation of countywide extended area service will have on Northeast Polk County.

Walter W. Storm. Director-Elderly Service Division, Polk County Board of County Commissioners. Mr. Storm will discuss the impact of countywide extended area service on the elderly and their efforts to obtain services provided.

Richard Thomas Wheeler. Chief of police for the City of Haines City. Mr. Wheeler will discuss law enforcement and the impact county wide extended area service will have on law enforcement in fighting crime.

Elizabeth Ann Toney. City Manager of the City of Haines City. Miss Toney will discuss the importance of county wide extended service for Haines City and its relationship to "Communities of interest" with other parts of Polk County. The impact of countywide extended area service on the economy and growth potential of the area and will comment on the reasons petitioner believes that the telephone traffic data

between Haines City and other areas of Polk County are not a true representation of the actual traffic flow.

2. **All Known Exhibits**

The City of Haines City has not been given access to data that has been prepared or compiled by the providers of telephone service, due to their seeking classification of that information as confidential. However, the City intends to use any exhibits that are produced or used by any other party or witness as applicable.

3. **Statement of Basic Position**

Countywide extended area service should be implemented. It is warranted by the present (part of which was not counted due to cellular telephones and providers other than GTE) and potential telephone traffic. Sufficient community of interest exists and more will be created by countywide extended area service. If the vote for countywide extended area service fails then extended calling service, or an alternative proposal 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

**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?

**Position:** Yes, there are other community of interest factors which include, but are not limited to, (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 form and discuss in detail)?

- A) EAS with 25/25 plan and regrouping
- B) Alternative toll plan

- C) ECS; and
- D) Other (specify)

**Position:** Existing toll rates inhibits economic development along the routes EAC 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?

**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 those routes or route?

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

5. **Other Matters**

The City of Haines City has no pending motions, and no issues have been stipulated. There are no requirements set forth in the order establishing procedure that cannot be complied with.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert Nettleton". The signature is written in a cursive style with a large, stylized "R" and "N".

Robert Nettleton  
P.O. Box 277  
Haines City, FL 22845-0277

Attorney for the City of Haines City

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

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.  
Mail or hand-delivery to the following parties on this 21st day of March, 1997

  
Robert Nettleton

Cochran Keating, Esq.  
Division of Legal Services  
Fla. Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

J. Jeffrey Whalen, Esq  
Ausley and McMullen  
227 S. Calhoun Street  
P.O. Box 391  
Tallahassee, FL 32301

Ann Shelfer  
Communications Department  
Fla. Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

Kimberly Caswell  
GTE Florida Incorporated  
One Tampa City Center  
P.O. Box 110, MC 7  
Tampa, FL 33601-0110