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May 27, 1997

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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: Docket No. 950699-TL

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint-Florida, Inc.'s Brief and Posthearing Statement of Issues and Positions.

We are also submitting the Brief 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
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Enclosures
cc: Parties of Record
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FPSC-BUREAU OF RECORDS

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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: 05/27/97

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**SPRINT-FLORIDA, INC.'S BRIEF AND
POSTHEARING STATEMENT OF ISSUES AND POSITIONS**

SPRINT-FLORIDA, INC. ("Sprint") files this Brief and Posthearing Statement of Issues and Positions.

I.

INTRODUCTION

This proceeding began when the City of Haines City ("HC") passed a resolution requesting extended area service ("EAS") from the HC exchange to all other exchanges in Polk County. A hearing was held on April 22, 1997, in HC. Sprint sponsored the testimony of one witness, Sharon E. Harrell, which was stipulated into the record without cross-examination. [Tr. 166.] Sprint also sponsored one exhibit (Exh. 3, SEH-1), the contents of which are confidential, and which was admitted into evidence at Tr. 165.

II.

BASIC POSITION

The Haines City to Ft. Meade route is the only route in this docket that involves Sprint. The calling patterns on this route do not meet the Commission's requirements to qualify for balloting for flat-rate, non-optional EAS, nor are they close enough to warrant any alternative form of toll relief. The testimony at the hearing

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did not show a sufficient community of interest between HC and Ft. Meade to justify any alternative toll relief.

III.

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 Lakes

*County seat of Polk County

**State and Federal offices serving the area

SPRINT POSITION: * No. According to Ms. Harrell's exhibit, traffic on the HC/Fort Meade route, which is the only route involving a Sprint exchange, does not meet the M/A/M or distribution requirement thresholds in Commission Rule 25-4.060(3).

* * *

Sprint's position on this issue is supported in the record at Tr. 166 - 167, and in Exhibit No. 3.

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?

SPRINT POSITION: ** Additional community of interest factors often considered are the location of schools, fire/police departments, medical/emergency facilities and county governments. When these factors are considered, the community of interest between HC and

Ft. Meade is not strong enough to warrant any alternative form of toll relief.

* * *

As noted, by Ms. Harrell, the Fort Meade exchange currently has EAS to Bartow, which is the County Seat, and Lakeland, where the State and Federal Offices serving this area are located. [Tr. 168] Schools and medical facilities are also located within the Fort Meade Exchange, therefore, these traditional community of interest factors do not support alternative toll relief for this route. [Tr. 168]

The testimony at the public hearings does not support a finding of sufficient community of interest for this route either. The areas with the greatest community of interest with HC are Lakeland, Bartow and Polk City. [Tr. 91, Carefoot; Tr. 101, DeGenarro; Tr. 116, Saag; Tr. 125, Storms; Tr. 160, Deal (City Manager)] The only witness that saw the HC to Ft. Meade as an important route was Ms. Deal, who felt that way because her parents live there. [Tr. 160]. While there may be a need for alternative toll relief on other routes involving HC in this case, the Commission should not find a community of interest sufficient to warrant alternative toll relief on the HC to Ft. Meade 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)

SPRINT POSITION:

a)** If flat-rate, non-optional EAS is ordered, 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)** There would be a loss of access revenue and an increase in local service revenues, resulting in an estimated annual revenue gain of \$130,000, 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)** 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, 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.

* * *

Sprint's position on this issue is supported in the record at Tr. 168-169, and in Exhibit No. 3.

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?

SPRINT POSITION: ** The Haines City/Port 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.

* * *

Sprint's position on this issue is supported on the record at Tr. 169.

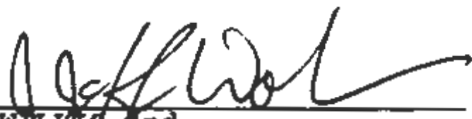
Issue 5: If a sufficient community of interest is found, what are the appropriate rates and charges for the plan to be implemented on these routes or route?

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

* * *

Sprint's position on this issue is supported on the record at Tr. 169.

DATED this 27th day of May, 1997.



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ATTORNEYS FOR SPRINT-FLORIDA, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 27th day of May, 1997, to the following:

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