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October 24, 1997

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Ms. Blanca Bayo
Clerk, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, Florida 32399-0850

In re: Indiantown Telephone System, Inc. - Request for Waiver - Docket No. 970744-
TP-Order No. PSC-97-1262-FOF-TP

Dear Ms. Bayo:

Commission Order PSC-97-1262-FOF-TL requires each Eligible Telecommunications Carrier (ETC) to make toll limitation services available to customers on a voluntary basis and at no charge. If any ETC is unable to provide toll limitation services now, the order allows such an ETC to file implementation plans and a request for waiver by October 23, 1997.

Indiantown Telephone System, Inc. (Indiantown) is prepared to offer toll blocking at this time. However, Indiantown believes that virtually no LEC in the nation is capable of providing toll limitation service as the FCC has defined it. The toll limitation services requirement was apparently added by the FCC at the final stage of the federal rulemaking without much, if any, comment by LECs. Indiantown believes that this misunderstanding regarding rational expectations of LEC capabilities has now been explained to FCC staff, and the issue could be reevaluated by the FCC.

Please accept this letter on behalf of Indiantown as a Request for Waiver of the requirement of Indiantown to provide toll limitation services.

Indiantown is unable to provide an implementation plan for toll limitation services until Indiantown can accomplish the following:

1. Determine the feasibility and technical capabilities of Indiantown's switch with regard to the installation of toll limitation services. Such toll limitation services would require real-time

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capability to record and rate every call instantaneously as the caller attempts to make a toll call. The ability to provide this service would also require the capability of differentiating between toll calls and other types of calls.

2. Determine the availability of and timing for receipt of reimbursement of costs for the incremental cost of switch upgrading and the cost of the incremental cost study.

As soon as implementation plans for switch upgrading to provide toll limitation services have been formulated, Indiantown will notify the Commission, provided that the FCC does not reconsider the requirement before then.

Sincerely,

A handwritten signature in black ink, appearing to read "David B. Erwin". The signature is fluid and cursive, with a large initial "D" and "E".

David B. Erwin

DBE/kdr

cc: Ann Marsh
Jim McGinn