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October 31, 1997

BY HAND DELIVERY

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

Re: Docket No. 970744-TP

Dear Ms. Bayo:


Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of Northeast's Implementation Plan.

We are also submitting the Implementation Plan 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

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cc: All parties of record

DOCUMENT NUMBER-DATE

11234 OCT 31 97

FPSC-RECORDS/REPORTING

In re: Establishment of eligible
telecommunications carriers)
pursuant to Section 214(e) of the)
Telecommunications Act of 1996.)
_____)

In re: Implementation of changes)
in the Federal Lifeline Assistance)
Plan currently provided by)
telecommunications carriers of)
last resort.)
_____)

DOCKET NO. 970744-TP
FILED: October 31, 1997

NORTHEAST'S IMPLEMENTATION PLAN

Pursuant to Order No. PSC-97-1261-FOF-TP, and Rule 25-22.037(2), F.A.C., and its Motion for Extension of Time, NORTHEAST FLORIDA TELEPHONE COMPANY ("Northeast"), submits the following toll limitation implementation plan:

Introduction

1. On October 23, 1997, Northeast requested a waiver of the requirement to provide full toll limitation services. In addition, it requested an extension of time to submit an implementation plan.

2. Northeast has further investigated the steps necessary to implement full toll limitation services as set forth in the FCC's Order. Northeast is currently offering Toll Blocking in all of its exchanges, but does not and cannot offer Toll Control as defined in the FCC Order. Accordingly, Northeast does not need a waiver of the FCC's Toll Limitation Requirements as they relate to Toll Blocking. Northeast's position on Toll Control is set forth below.

Toll Control

3. Northeast has several interexchange carriers operating in

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its exchanges in Florida. Currently, each of those IXCs rates its own toll calls and only forwards the rated messages to Northeast only if Northeast bills for that IXC. Northeast only bills for AT&T under a B&C arrangement, so it never receives rated messages from most IXCs. There are no procedures or systems in place for the IXC transfer of rated messages on a real time, on-line basis. Nor does Northeast have the ability to transfer rated messages on a real-time, on-line basis for LEC provided intraLATA toll.

4. To implement Toll Control as envisioned by the FCC, a new process will need to be developed. IXCs would need to receive and rate each message and then transfer the resulting charge for each toll message to the responsible LEC on a real time basis. LEC provided intraLATA toll would also need to be rated on a real time basis. The responsible LEC would then have to accumulate each customer's IXC and LEC provided toll on a real time basis and compare the results to the preset limit on toll for low income subscribers. Once the limit is reached, the low income subscriber's ability to make toll calls would need to be discontinued on a real time basis. This would take a nationwide network similar to the one being established for local number portability; however, doing so would be more complex since it would require many more processes than "simple" number portability.

5. Based on Northeast's investigation, it is clear that the systems and technology necessary to implement Toll Control are not available. The cost of developing the technology and systems will be staggering. Northeast is not aware of any plans to develop

these systems and does not anticipate the development of the necessary technology and systems in the foreseeable future. Accordingly, Northeast suggests that the FPSC grant a blanket waiver for the Toll Control requirement pending development of the necessary technology and systems.

6. Northeast further understands that the FCC is or will soon be in the process of reconsidering its Order as it relates to Toll Control.

Plan

7. Accordingly, with this as background, Northeast proposes to take the following steps:

(a) Continue offering Toll Blocking to its customers in accordance with its FPSC approved tariffs.

(b) Continue monitoring the activity of the FCC to determine whether it will reconsider its Order as it relates to Toll Control.

(c) Advise the FPSC and its Staff when and if the technology and systems necessary to provide Toll Control become available.

(d) If the FCC does not reconsider its Order as it relates to Toll Control, and the technology and systems necessary to implement Toll Control become available, determine (1) the incremental costs of implementing Toll Control, (2) the availability of and timing for receipt of reimbursement of the incremental costs of the implementation of Toll Control, and (3) market demand for Toll Control services.

(e) Once those determinations have been made, prepare a time table for implementing Toll Control in portions of its territory

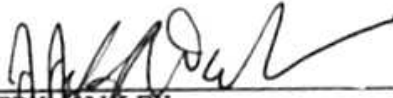
where it makes economic sense to do so in light of the incremental costs and market demand for the service.

(f) Submit the time table to the FPSC for its review and consideration.

(g) Cooperate with the FPSC and its staff as the FPSC attempts to implement the Toll Limitation Requirements in the FCC Order.

DATED this 31st day of October, 1997.

Respectfully submitted,



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ATTORNEYS FOR NORTHEAST

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been served by U. S. Mail or hand delivery (*) on this 31st day of October, 1997 to the following:

Mr. Will Cox*
Staff Counsel
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Ms. Ann Marsh*
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
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ATTORNEY



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