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LAW OFFICES  
**McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A.**

LYNWOOD F. ARNOLD, JR.  
JOHN W. BAKAS, JR.  
C. THOMAS DAVIDSON  
STEPHEN O. DECKER  
LINDA E. JOHNS  
VICKI GORDON KAUFMAN  
JOSEPH A. MCGLOTHLIN  
JOHN W. MCWHIRTER, JR.  
RICHARD W. REEVES  
FRANK J. RIEF, III  
DAVID W. STEEN  
PAUL A. STRAKER

100 NORTH TAMPA STREET, SUITE 2800  
TAMPA, FLORIDA 33602-5120  
MAILING ADDRESS: TAMPA  
P.O. BOX 3350, TAMPA, FLORIDA 33601-3350  
TELEPHONE (813) 224-0800  
FAX (813) 221-1854  
CABLE GRANDLAW  
PLEASE REPLY TO  
TALLAHASSEE

TALLAHASSEE OFFICE  
117 N. GARDEN  
TALLAHASSEE, FLORIDA 32301  
TELEPHONE (850) 222-2525  
FAX (850) 222-5600

November 17, 1997

**VIA HAND DELIVERY**

Ms. Blanca Bayó  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 971056-TX  
In re: Application for certificate to provide alternative local exchange telecommunications service by BellSouth BSE, Inc.

Dear Ms. Bayó:

Enclosed are the original and 15 copies of FCCA's Petition on Proposed Agency Action to be filed in the above docket.

I have enclosed an extra copy of the above documents for you to stamp and return to me. Please contact me if you have any questions. Thank you for your assistance.

Sincerely,

*Joseph A. McGlothlin*  
Joseph A. McGlothlin

- AP \_\_\_\_\_
- AF \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CITU \_\_\_\_\_
- CTR \_\_\_\_\_
- ETS \_\_\_\_\_ JAM/jg
- LET \_\_\_\_\_
- LET 5 Enclosures
- CTD \_\_\_\_\_
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DOCUMENT NUMBER-DATE  
11783 NOV 17 97  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for certificate ) Docket No. 971056-TX  
to provide alternative local )  
exchange telecommunications )  
service by BellSouth BSE, Inc. ) Filed November 17, 1997

**PETITION ON PROPOSED AGENCY ACTION**

Pursuant to Rules 25-22.029 and 25-22.036, Florida Administrative Code, the Florida Competitive Carriers Association files its Petition on Proposed Agency Action directed to Order No. PSC-97-1347-FOF-TX, and states:

1. The name and address of petitioner:

Florida Competitive Carriers Association  
117 South Gadsden Street  
Tallahassee, Florida 32301

2. Copies of orders, motions, and pleadings should be provided to:

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
117 South Gadsden Street  
Tallahassee, Florida 32301

**STATEMENT OF HOW SUBSTANTIAL  
INTERESTS WILL BE AFFECTED**

3. In PAA Order No. PSC-97-1347-FOF-TX, the Commission proposes to issue a statewide grant of authority to BellSouth BSE, Inc. to engage in business as an alternative local exchange company ("ALEC"), even though BellSouth BSE, Inc. is a subsidiary of BellSouth Telecommunications, Inc. ("BellSouth"), which is the incumbent local exchange company ("ILEC") in much of the State, and even though BellSouth has already applied for and received an ALEC certificate issued under its

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FPSC-RECORDS/REPORTING

own name and its own corporate capacity (see Order No. PSC 96-0704-FOF-TX, issued in Docket No. 960276-TX on May 23, 1996).

4. In Order No. PSC-97-1347-FOF-TX, the Commission properly identified the issue of whether a grant of such statewide authority to BellSouth BSE, Inc. would circumvent the obligations and restrictions placed on BellSouth by the Federal Telecommunications Act of 1996 ("the Act"), which were then under consideration in Docket No. 960786-TL.<sup>1</sup> In so doing, the Commission correctly recognized that (1) BellSouth BSE, Inc. is simply BellSouth in another form, and (2) a nexus exists between BellSouth BSE, Inc.'s application and BellSouth's obligations under the Act. That BellSouth must be identified as the same entity as its subsidiary for purposes of the Act is obvious, given that BellSouth has conferred its name on the subsidiary; BellSouth will be the source of both the capital and the management expertise of BellSouth BSE; and the subsidiary's profits will inure to BellSouth. Clearly, BellSouth BSE's customers will perceive BellSouth BSE, Inc. to be the same entity as BellSouth.

5. In Order No. PSC-97-1347-FOF-TX, the Commission concluded that the issuance of a statewide ALEC certificate to BellSouth BSE would not circumvent Docket No. 960786-TL. However, in the order, the Commission considered only the implications of the application of BellSouth's new alter ego on the relationship between the Act and BellSouth's long distance activities. The Commission failed to consider whether granting the application, without appropriate restrictions, would

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<sup>1</sup> Docket No. 960786-TL, In re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLata services pursuant to Section 271 of the Federal Telecommunications Act of 1996.

enable BellSouth to circumvent the requirements that the Act imposed on BellSouth with respect to its local exchange services.

6. Allowing BellSouth to provide local exchange services in the geographical areas in which it serves as the ILEC would affect FCCA's substantial interests by undermining and subverting the legal relationships created by the Act, thereby subjecting FCCA's members to anticompetitive and unfair treatment. For instance, Section 251(c)(4) of the Act imposes an obligation on BellSouth to permit its competitors in the local exchange market to resell BellSouth's local services. Section 252(d)(3) of the Act requires BellSouth to provide those services to its competitors at a wholesale price that is based upon a discount from BellSouth's retail price. Of course, in pricing its competing retail service, the competitor must add to the discounted wholesale price it pays to BellSouth its own costs of providing the service. An adequate differential between the price BellSouth charges its retail customers and the wholesale price it charges its competitors is the key to viable resale-based competition in the local exchange market.

7. Granting BellSouth BSE the authority to engage in the local exchange business in areas in which BellSouth is the ILEC would subvert the relationship established by the Act between the retail price BellSouth charges its customers and the wholesale prices it charges its competitors. Under the Act, if BellSouth lowers its retail price, the effect of the wholesale discount lowers its competitors' costs simultaneously, and they can respond to BellSouth competitively by lowering their own prices. Thus, BellSouth, the ILEC, can never defeat competition by lowering its

retail price without also lowering the corresponding wholesale price. However, if BellSouth is permitted to sell its services at a discount to "itself" (the subsidiary ALEC), then resell to customers, this mandatory relationship would be circumvented. For example: Assume BellSouth's retail price is \$10 and the discounted wholesale price is \$8. Unaffiliated competitors must pay BellSouth \$8, and add their own costs to arrive at a price that competes with the \$10 rate. However, because BellSouth BSE could buy the service from BellSouth at \$8 and resell it at retail at (say) \$8 (without experiencing the same consequences as the unaffiliated competitors would, since the transaction would be self-dealing), BellSouth's competitors would be unfairly and anticompetitively squeezed between the price they must pay BellSouth and the price at which BellSouth's alter ego offers the service to customers. In short, the proposed statewide certificate would enable BellSouth to circumvent the relationship between the ILEC's retail and wholesale prices that Congress created as one of the primary means of introducing competition to the local exchange market.

8. BellSouth's attempt to circumvent the Act by using the device of a subsidiary is not unique. Recently, regulators elsewhere have taken measures designed to prevent an ILEC from using a subsidiary to avoid its obligations. In October 1997, the Texas Public Utility Commission authorized GTE's affiliated competitive local exchange carrier, GTE Communications Corp., to compete against Southwestern Bell and Sprint, but properly refused to authorize that ALEC to conduct

business areas served by GTE Southwest, Inc., its affiliated incumbent local exchange carrier.<sup>2</sup>

9. In its regulation of ALECs, including BellSouth BSE, Inc., the Commission has the power and the obligation to prevent anti-competitive behavior and to ensure that all telecommunications companies are treated fairly. Sections 364.01(g) and 364.337(5), Florida Statutes.

10. The Commission must treat as inviolate the relationships, rights, and obligations created by the Act. The Commission cannot propose to grant the authority requested by BellSouth BSE without affecting FCCA's substantial interests, any more than it could propose to exempt BellSouth from the requirements of the Act without doing so. In light of this protest, the Commission must conduct a proceeding and take measures needed to ensure the fair treatment of all telecommunications providers who wish to provide alternative local exchange service in areas in which BellSouth is the ILEC. This can be ensured adequately and effectively only by prohibiting BellSouth's subsidiary from providing ALEC service in geographical areas in which BellSouth serves as the ILEC.

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<sup>2</sup> The Texas PUC severed the GTE subsidiary's request to "compete" with its ILEC parent from the remainder of the application, so that a separate order of denial could be entered relative to the proposal to "compete" with GTE Southwest. As of this date, the order of denial has not been issued. Attached as Exhibit A is a transcript of the Texas PUC's decision conference in this matter.

### STATEMENT OF KNOWN DISPUTED FACTS

11. FCCA disputes the proposed finding in Order No. PSC-97-1347-FOF-TX that the granting of statewide ALEC authority to BellSouth BSE, Inc. would not circumvent the proceeding designed to ensure that BellSouth complies with all obligations imposed on it by the Telecommunications Act of 1996.

### ULTIMATE FACTS ALLEGED

12. Participation by BellSouth BSE, Inc., as an ALEC in the geographical area in which its parent, BellSouth, presently serves as ILEC would create customer confusion, subvert carefully designed state and federal regulatory schemes, and thwart the intent of federal and state law to develop competition within the local exchange.

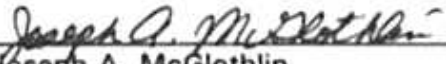
### SCOPE OF PETITION

13. This petition is limited to the protest of a grant of authority to BellSouth BSE, Inc. to engage as an ALEC in BellSouth's certificated ILEC territory. FCCA does not oppose, and this petition does not address, the grant of authority to BellSouth BSE, Inc. to engage as an ALEC in areas of the state in which BellSouth does not serve as the ILEC.

### DEMAND FOR HEARING

14. FCCA requests the Commission to conduct a hearing governed by Section 120.57, Florida Statutes on BellSouth BSE, Inc.'s application and FCCA's objections thereto.

WHEREFORE, FCCA requests the Commission to prohibit BellSouth BSE, Inc. from engaging as an ALEC in all geographical areas in which BellSouth serves as the incumbent local exchange company.

  
\_\_\_\_\_  
Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas  
117 South Gadsden Street  
Tallahassee, Florida 32301  
(904) 222-2525

Attorneys for  
Florida Competitive Carriers Association



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition on Proposed Agency Action has been furnished by United States mail or hand delivery( \*) this 17th day of November, 1997, to the following:

Martha Carter Brown\*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard, Room  
390-M  
Tallahassee, Florida 32399-0850

Nancy B. White\*  
c/o Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301

Nancy B. White  
BellSouth Telecommunications, Inc.  
Museum Tower Building, Suite 1910  
Miami, Florida 33130

  
\_\_\_\_\_  
Joseph A. McGlothlin

OCT 1 1997

DOCKET NO. 16495

SOAH DOCKET NO. 473-96-1803

General Counsel By \_\_\_\_\_

APPLICATION OF GTE  
COMMUNICATIONS CORPORATION  
FOR A CERTIFICATE  
OF OPERATING AUTHORITY

§  
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BEFORE THE PUBLIC  
UTILITY COMMISSION OF TEXAS

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DOCKET NO. 18146

APPLICATION OF GTE  
COMMUNICATIONS CORPORATION  
FOR A CERTIFICATE  
OF OPERATING AUTHORITY IN SWBT,  
SPRINT/UNITED, AND CENTEL SERVICE  
TERRITORIES (RE: DOCKET NO. 16495)

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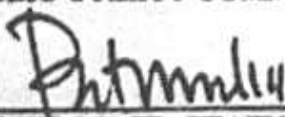
BEFORE THE PUBLIC UTILITY  
COMMISSION OF TEXAS

ORDER OF SEVERANCE

This order severs GTE Communications Corporation's (GTE-CC's) application for a certificate of operating authority (COA) in the service territories of Southwestern Bell Telephone Company (SWBT), Sprint/United, and Centel from Docket No. 16495 and places the application for those areas into Docket No. 18146, *Application of GTE Communication Corporation for a Certificate of Operating Authority in SWBT, Sprint/United and Centel Service Territories (Re: Docket No. 16495)*. Docket No. 16495 now applies only to GTE-CC's application for a COA in GTE Southwest, Inc.'s service areas.

SIGNED AT AUSTIN, TEXAS the 30th day of October 1997.

PUBLIC UTILITY COMMISSION OF TEXAS

  
PAT WOOD, III, CHAIRMAN

  
JUDY WALSH, COMMISSIONER

EXHIBIT "A"

1           COMM. WALSH: Well, I didn't  
2 realize that.

3

4           AGENDA ITEM NO. 14 \_\_\_\_\_

5 DOCKET NO. 16495 (SOAH No. 473-96-1803)  
6 APPLICATION OF GTE COMMUNICATIONS  
7 CORPORATION FOR A CERTIFICATE OF  
8 OPERATING AUTHORITY.

9

10          CHAIRMAN WOOD: All right.

11 Dock No. 16495, application of GTE for a  
12 certificate of operating authority.

13          You get the short straw.

14          COMM. WALSH: I would be in

15 favor of granting GTE Communications

16 Corporation a COA for all service

17 territories other than GTE Southwest. And

18 I think it would be worthwhile to sever

19 that issue and take some time to resolve

20 both the legal and policy issues that are

involved in whether or not that is an

appropriate thing for us to grant. And

21 rather than poison the water on that, I  
22 think I'll just say that. I think we ought  
23 to -- I'm not in favor of approving it in  
24 their own territory, and I think rather  
25 than rule on it today it probably would be

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1 go a good thing to sever it and really  
2 consider all the ramifications of what we  
3 might do on that issue.

4 CHAIRMAN WOOD: I would  
5 agree with that. Why don't we sever then  
6 the application into two parts, grant the  
7 part for the application of authority  
8 outside of GTE Southwest's service area  
9 and -- certificated service area, and  
10 consider that next week?

11 COMM. WALSH: And then  
12 probably -- I don't know, Steve, would we  
13 then put up a -- for the severed portion  
14 what procedurally do you think we need to  
15 do?

16 MR. DAVIS: We'll sever out  
17 the non-GTE service area portion into a new  
18 docket and issue a Final Order that  
19 approves the COA in those service areas.

20 COMM. WALSH: And then this

1           COMM. WALSH: All right.

2   And in terms of addressing the particular  
3   issues then, what procedure do we need to  
4   do in this docket to move it forward then?

5           MR. DAVIS: The procedural  
6   issues?

7           COMM. WALSH: I mean, we  
8   then will have the open issue of whether or  
9   not it should be granted in GTE Southwest  
10   service area in this docket.

11          MR. DAVIS: Right. Well, if  
12   you like, OPD staff will undertake to do  
13   that analysis and brief you on it before  
14   the next meeting.

15          COMM. WALSH: I'd like to  
16   have a brief on the legal issues, whether  
17   under PURA and under the precedents that  
18   we've already established in terms of  
19   affiliates to LECs applying for these  
20   certificates, whether or not it should be

21 granted from a legal point of view. And  
22 then I think we also need to look at the  
23 public policy issues as well.

24 CHAIRMAN WOOD: Any  
25 particular line of questioning there

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1 that --

2           COMM. WALSH: I'm  
3 concerned -- and I'm not going to come as a  
4 surprise to anybody -- but I'm concerned  
5 that where you have a corporation that has  
6 a CCN and they have all the obligations  
7 that you have an incumbent local  
8 exchange company, both service quality,  
9 Universal Service and obligations under  
10 PURA and the FTA, that if a -- a total  
11 affiliate is granted a different  
12 certificate without those obligations,  
13 whether it's anti-competitive and whether  
14 it circumvents regulation and whether or  
15 not it basically is counterproductive to  
16 opening these markets in a fair way to  
17 everybody.

18           CHAIRMAN WOOD: I couldn't  
19 agree more. And in fact, I went back and  
20 reviewed the Sprint docket that was relied



21 upon as support for what's going on here,  
22 and -- I don't know what to do about it  
23 now, but I think there's probably a problem  
24 with that order.  
25           COMM. WALSH: We were

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1 concerned about these issues in the Sprint  
2 docket. And we made a determination then  
3 that we believed that the public interest  
4 could be protected by putting in  
5 safeguards. If we don't believe that in  
6 this docket, then I think we have to change  
7 our policy on that.

8           CHAIRMAN WOOD: I'm -- I  
9 mean, I'm -- I think there are probably  
10 some legal issues that I wasn't -- none of  
11 the parties had raised at that time in that  
12 issue since it was a stipulated docket that  
13 I would think would be germane now that  
14 we've kind of had the chance to look  
15 through this.

16           Would you want to have a little  
17 briefing between now and next week from the  
18 parties or anything on this? I mean, it  
19 looks like it obviously was fleshed out --

20           COMM. WALSH: I'm open to

21 how we move forward, and I think we -- I  
22 just didn't want to sort of decide it today  
23 without having a further look at that issue  
24 severed from the other and just get the  
25 other one moving. But I have serious

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1 concerns about it. I'm not sure that even  
2 as a legal matter -- I guess at the outset  
3 if GTE Southwest were requesting a COA in  
4 their own territory, I don't think we could  
5 grant that as a legal matter.

6 CHAIRMAN WOOD: That's where  
7 I'm going on that.

8 COMM. WALSH: And we have on  
9 these affiliate issues said that we're not  
10 going to allow these 100 percent related  
11 affiliates to circumvent the requirements  
12 of our statute and the FTA for what these  
13 companies have to do. I mean, it would  
14 make a mockery of the whole regulatory and  
15 legal scheme. So...

16 CHAIRMAN WOOD: I guess --  
17 my thought is if we could get there on a  
18 legal issue, then --

19 COMM. WALSH: Well --

20 CHAIRMAN WOOD: -- why got

21 do it now?

22           COMM. WALSH: Well, I think  
23 that the statute says that you cannot have  
24 a -- that a single company can't have a COA  
25 and an SPCOA in the same territory. The

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1 statute also says -- and the CCN stuff was  
2 already there -- the statute then says,  
3 "...in lieu of a CCN you can get a COA."  
4 And it's my considered legal opinion --  
5 (laughter) -- for whatever that's worth  
6 that that means that a CCN holder cannot  
7 hold a COA in its own territory.

8       And if we follow our rationale  
9 about affiliates not being able to do what  
10 their mirror images can't do, then I could  
11 very easily say that this COA can't be  
12 granted in their own territory. And I'm  
13 willing to listen to what people have to  
14 say about that, but that's sort of where I  
15 am.

16       CHAIRMAN WOOD: Good.

17       MR. DAVIS: Would you like  
18 the parties to file briefs on the legal  
19 issue?

20       CHAIRMAN WOOD: Yeah.

21 That's what I guess I'd like -- you mention

22 that -- What was that again? In lieu of?

23 COMM. WALSH: Yes. The COA

24 statute says "in lieu of a CCN." It

25 doesn't say in addition to. And it's

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1 consistent with the whole scheme of if you  
2 don't come in for a COA, you can't have a  
3 SPCOA? And it says if you want to do  
4 business, you can get a CCN, or in lieu of  
5 a CCN you can do a COA. And it doesn't say  
6 "in addition to."

7 CHAIRMAN WOOD: And that's  
8 great. I found -- 54 102(a):

9 "In lieu of applying for a CCN, a  
10 person may apply for a COA"

11 And in the same intro to the  
12 SPCOA section says:

13 "The Commission may not grant a  
14 certificate, an SPCOA, to the  
15 holder of a CCN or COA for the  
16 same territory."

17 COMM. WALSH: I consider  
18 them mutually exclusive under the law.

19 CHAIRMAN WOOD: Yeah.

20 COMM. WALSH: So the only



21 issue then is whether you apply it to an  
22 affiliate, and of course I've been pretty  
23 clear on what I feel about --

24           CHAIRMAN WOOD: Well, it  
25 says person. I mean, it says a person may

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1 apply, and I think the definition of  
2 "person" is very broad under PURA, so...

3 I don't know that I really --

4 MR. DAVIS: Well, we could  
5 issue --

6 CHAIRMAN WOOD: I'd like --

7 COMM. WALSH: Well, you want  
8 to just say no or do you want to let the  
9 parties brief it?

10 CHAIRMAN WOOD: It's what a  
11 hearing can do, and we're hearing --

12 COMM. WALSH: Okay. I'm not  
13 in favor of granting this COA.

14 CHAIRMAN WOOD: And I think  
15 on the grounds of what --

16 COMM. WALSH: On the grounds  
17 of the law --

18 CHAIRMAN WOOD: -- what the  
19 law says, and I have no problem admitting I  
20 think we probably goofed in Sprint.

21           COMM. WALSH: And I guess  
22 what we need to do with Sprint is consider  
23 whether or not we need to get them to come  
24 in and voluntarily give up one of though  
25 certificates or whatever. We'll consider

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1 that another day.

2           **CHAIRMAN WOOD:** But I  
3 think -- you know, if this thing goes to  
4 court, I think we need to admit that the  
5 Sprint thing was -- I mean, we were so  
6 focused in on the waiver of the build-out  
7 issue, I mean, I went back and looked at my  
8 notes and my whole notes were on how the  
9 waiver of the build-out because that was  
10 the first case where we had done that. Or  
11 first study cases and -- if we're wrong,  
12 we're wrong. I think we'd better admit it  
13 rather than compound the error by saying --

14           **COMM. WALSH:** Well, I think  
15 we were wrong and I think there's a -- the  
16 only good public policy determination and  
17 one that's under the law is to say that  
18 this is not an appropriate thing to do.

19           **CHAIRMAN WOOD:** Okay. The  
20 Chair will entertain a motion to grant the

- 21 certificate in part and deny it in part.
- 22           COMM. WALSH: So move.
- 23           CHAIRMAN WOOD: Amen.
- 24           MR. DAVIS: In the interest
- 25 of getting this portion of the order out

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1 granting the certificate, I would suggest

2 we still sever because it may take us --

3 CHAIRMAN WOOD: Okay.

4 MR. DAVIS: -- a little

5 while --

6 CHAIRMAN WOOD: Yeah, my

7 thought is get on out and let GTE as a

8 family of companies get on out into

9 competition elsewhere, because the more the

10 merrier. But I share your concerns on

11 policy basis and fortunately the laws, I

12 think, \*clear -- or it wasn't clear -- it

13 is clear on that issue that you don't need

14 two where one is good enough. And the one

15 they have is the one that we regulate. And

16 you've been going there since 15711 and you

17 know the light really went off in this PFD.

18 And, unfortunately, I guess our precedents

19 carried the weight of gold because no one

20 goes back and questions under the law. But

21 the point you just made about the "in lieu  
22 of" is kind of a red flag that you don't  
23 get two. The GTE Southwest and GTE CC are  
24 the same corporation.

25           COMM. WALSH: Well, you

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1 know, there's a Finding of Fact in here,  
2 and I guess we're too used to looking at  
3 boxes and containers and that that says  
4 if -- if AT&T can sell this service at no  
5 less than 77 cents, GTECC would never sell  
6 it for 75 cents because they'd want to make  
7 the -- that misses the whole point. Of  
8 course, they'll sell it for 75 cents  
9 because they can drive everybody else out  
10 of the market. They will get all of the  
11 other collateral services and the long  
12 distance business.

13 And to sort of assume that a  
14 corporation is related to another  
15 corporation won't price below what they can  
16 get for something to drive other people out  
17 of the market and to make sure they capture  
18 other business is not reality. I mean, it  
19 happens all the time if you have an  
20 opportunity to do that, and we cannot have



21 that happening at this time when we have  
22 monopoly providers and we're trying to get  
23 the market open.

24           CHAIRMAN WOOD: And it  
25 means - I mean, I don't want to rush this,

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1 but is there any reason not to go ahead and  
2 decide --

3 COMM. WALSH: Not to me.

4 CHAIRMAN WOOD: Okay.

5 COMM. WALSH: I was bending  
6 over backwards to be fair, but -- I  
7 think --

8 CHAIRMAN WOOD: Well, I  
9 mean, we are fair. It's just a reading of  
10 the law and that's what we're called upon  
11 to do. And if -- I mean, if they've got a  
12 good argument on rehearing, I read those  
13 just like I read briefs on exceptions. So  
14 I'd just as soon get this -- get this  
15 on-going and get it out of here.

16 COMM. WALSH: I agree.

17 CHAIRMAN WOOD: It has been  
18 here a long time and I'm glad to see it  
19 finally get out of here and see one more  
20 competitor, and a formidable one at that, in

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1 certificated service area, and deny the COA  
2 for GTECC within the certificated service  
3 area of GTE of the Southwest.

4 MR. DAVIS: And to clarify,  
5 the severed portion will get a new docket  
6 number, and that should be issued fairly  
7 quickly.

8 CHAIRMAN WOOD: Yes.

9 COMM. WALSH: So move.

10 CHAIRMAN WOOD: Amen.

11

12 AGENDA ITEM NO. 15

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13 DOCKET NO. 17278 (SOAH No. 473-97-0925)  
14 APPLICATION OF SOUTHWESTERN BELL  
15 TELEPHONE COMPANY FOR REVISION TO  
16 ACCESS SERVICE TARIFF RELATING TO  
17 OPERATOR TRANSFER SERVICE.

18

19 CHAIRMAN WOOD: Item 15,  
20 application of Southwestern Bell Telephone  
21 to revise its Access Service Tariff  
22 relating to operator transfer service.