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December 18, 1997

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 960312-TP
Proposed Rules relating to Operator Services Providers

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Public Communications, Inc.'s Comments, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White (NW)

--- Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

ACK ✓
A.M.
A.M. Caldwell
J. ---

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE:) Docket No. 960312-TP
)
Proposed amendments to Rules 25-4.002,)
F.A.C., Application and Scope; 25-24.600, F.A.C.,)
Application and Scope; 25-24.610, F.A.C., Terms)
and Definitions; Rules Incorporated;)
25-24.620, F.A.C., Service Requirements for)
Companies Providing Operator Services;)
25-24.630, F.A.C., Rate and Billing)
Requirements; and 25-24.800, F.A.C., Scope.) Filed: December 18, 1997
)

FINAL

COMMENTS OF BELL SOUTH PUBLIC COMMUNICATIONS, INC.

I. INTRODUCTION

COMES NOW, BellSouth Public Communications, Inc. ("BSPC"), through counsel, in response to the Florida Public Service Commission Staff's Notice of Proposed Rule Amendments, dated December 3, 1997, and hereby provides its Comments in this Docket. More specifically, the staff proposed rule amendments resulting from a rule development workshop of October 28, 1997 and relating to rules applying to Operator Service Providers. BSPC herein provides its Comments to the proposed rules.

COMMENTS

BSPC believes Rule 25-24.620(c) as proposed, for Payphone Service Providers (PSP) who act as their own operator service provider or who contract with other companies for the provision of operator services, incorrectly limits their ability to route 0+ calls to the pay telephone provider's carrier of choice. Such limitation is

inconsistent with the proposed Pay Telephone Service Rule 25-24.515(12) and the authority provided to PSPs with the pay telephone rules to route 0+ local and long distance calls to their operator service provider. Since Operator Service Provider Rules apply to those services provided at payphones as well as aggregator locations, BSPC believes an exception to this rule is in order. BSPC proposes the following modification to Rule 25-24.620(c):

(c) With the exception of operator services provided at payphones where 0+ local calls may be routed to the PSP's carrier of choice, route all end user dialed 0+ local and all 0- calls to the provider of local exchange telecommunications services unless the end user dials the appropriate access code for his carrier of choice, such as 950, 800, 888, or 10XXX; and

Rule 25-24.630 (2) as proposed creates a similar conflict for Operator Services Providers who provide such service at payphones. Rate caps for 0+ local calls placed from payphones, as proposed in rules relating to pay telephone service, are limited to the local rate posted at the pay telephone station plus a \$1.75 charge. To provide clarity to the rate caps for 0+ local calls placed from payphones when such calls are handled by an operator services provider, a modification to this rule is appropriate. BSPC proposes the following modification:

(2) The charge for an end user dialed 0+ local call shall not exceed \$.35 per call, plus applicable operator charges, except on payphones where the end user shall be charged the local rate posted at the pay

telephone station plus an operator charge which does not exceed the pay telephone rate caps.

Respectfully submitted this 18th day of December, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (w)

ROBERT G. BEATTY

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**CERTIFICATE OF SERVICE
DOCKET NO. 960312-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by
U.S. Mail this 18th day of December, 1997 to the following:

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