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December 19, 1997

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WILLIAM J. ROBERTS
OF COUNSEL

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

Re: Docket # 930239-TL

Dear Ms. Bayo:

Enclosed find an original and 15 copies of Prehearing Statement regarding the above-captioned docket, which I would appreciate your filing.

Thank you.

Very truly yours,

David B. Erwin

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Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Resolution by the Taylor County)	
Board of Commissioners for countywide)	Docket No. 930235-TL
extended area service (EAS) within)	
Taylor County)	Filed: December 19, 1997
)	

PREHEARING STATEMENT

GTC, Inc., through its undersigned attorneys and pursuant to Rule 25-22.038(2), Florida Administrative Code, and Orders Numbers PSC-97-1382-PCO-TL and PSC-97-1383-PCO-TL, files this Prehearing Statement.

- a.. The only witness that will testify on behalf of GTC, Inc. is Lynda Bordelon. The witness has prefiled testimony.
- b. At this time, GTC, Inc. does not know of any exhibits that will be filed, although attempts are still being made to obtain cost data. Such data, if determined, might be filed as an exhibit, but it is more likely that it would be filed as supplemental prefiled testimony.
- c. The basic position of GTC, Inc. is that there is probably no community of interest on an exchange-to-exchange basis and that even if there is a community of interest for the Taylor County pocket in the Cross City Exchange, the costs and administrative burdens of providing EAS would be prohibitive. Nevertheless, GTC believes that there exists a need for Steinhatchee residents in Taylor County to be able to call their county offices in Perry without paying traditional toll charges. GTC, Inc. does not, however, feel that EAS with a 25/25 plan and regrouping is appropriate. GTC could implement an alternative interLATA toll plan for calling from the Perry and Keaton Beach exchanges to the Taylor County pocket area, but this would not satisfy needs and would create an unworkable

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administrative billing problem. If there is any solution, it must be implemented by BellSouth.

d,e,f & g. The position of GTC, Inc. on the issues set forth in Order No. PSC-97-1383-PCD-TL is as follows:

ISSUE 1:

Is there a sufficient community of interest on the Cross City (Taylor County pocket)/Keaton Beach, and Cross City (Taylor County pocket)/Perry routes to justify surveying for monoptional extended area service as currently defined in the Commission rules or implementing an alternative interLATA toll plan?

RESPONSE TO ISSUE 1:

No position. GTC has no current traffic data. GTC does have one-way data from 1993, but that data is exchange to exchange data; it does not address any pocket route traffic.

ISSUE 2:

If a sufficient community of interest is found on either of the routes identified in Issue 1, what is your position regarding each of the following plans (summarize in chart form and discuss in detail) and how should they be implemented?

- a. EAS with 25/25 plan and regrouping;
- b. Alternative InterLATA toll plan; and
- c. Other (specify)

RESPONSE TO ISSUE 2:

Even though the 1993 traffic studies show a low calling volume (less than .99 M/A/M), GTC, Inc. realizes that there exists a need for Steinhatchee residents in Taylor County to be able to call their county offices in Perry without paying traditional toll charges. GTC, Inc. does not, however, feel that EAS with a 25/25 plan and regrouping is appropriate. GTC could implement an alternative

interLATA toll plan for calling from the Perry and Keaton Beach exchanges to the Taylor County pocket area, but this would not satisfy needs and would create an unworkable administrative billing problem. If there is any solution, it must be implemented by BellSouth.

ISSUE 3:

Should subscribers be required to pay an additive as a prerequisite to surveying for flat rate, two-way, nonoptional extended area service? If so, who should pay the additive, how much of a payment is required, and how long should it last?

RESPONSE TO ISSUE 3:

If this issue relates only to the pocket (See Issue 1), GTC has no position on this issue. This is a matter that must be resolved by BellSouth, since the subscribers in question are BellSouth subscribers only. If this is viewed as an exchange to exchange issue, then, of course all of GTC's and BellSouth's subscribers in all the affected exchanges should be required to pay an additive to defray expenses.

ISSUE 4:

If a sufficient community of interest is found, what are the appropriate rates and charges for any alternative plan and how should it be implemented on either of the routes identified in Issue 1?

RESPONSE TO ISSUE 4:

GTC assumes that this issue involves only pocket calling. If that assumption is correct, GTC has no position about rates that affect only BellSouth's subscribers. However, if pocket calling is approved, there will be significant, although as yet unquantified, expenses to GTC that will be unrecoverable. For example, the cost of two T1's from Perry to Gainesville (the location of the Cross City switch) would cost GTC \$7,000.00 per month.

ISSUE 5:

If extended area service or any alternative plan is determined to be appropriate, which customers should be surveyed?

RESPONSE TO ISSUE 5:

GTC believes that any subscribers who will pay an additive should be balloted.

- h. No issues have been stipulated by the parties.
- i. GTC, Inc. is not aware of any pending motions and seeks no action or any other matter.
- j. GTC, Inc. is not aware of any requirements in the prehearing orders that cannot be complied with.

Respectfully submitted,

David B. Erwin

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Attorney for GTC, Inc.

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CERTIFICATE OF SERVICE DOCKET NO. 930235-TL

I HEREBY CERTIFY that a copy of the foregoing has been mailed this day of December, 1997, to the following:

Beth Culpepper Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 GTC, Inc. P. O. Box 220

Port St. Joe, FL 32456-0220

Steinhatchee Community Projects Board, Inc. P. O. Box 736 Steinhatchee, FL 32359 Taylor County Board of Commissioners P. O. Box 620 Perry, FL 32347-0620

Nancy B. White BellSouth Telecommunications, Inc. 150 s. Monroe St., Rm 400 Tallahassee, FL 32301

David B. Erwin

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