

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Rule 25-24.845, F.A.C.)
Customer Relations; Rules Incorporated,)
and proposed amendments to Rules)
25-4.003, F.A.C., Definitions; 25-4.110,)
F.A.C., Customer Billing; 25-4.118, F.A.C.,)
Interexchange Carrier Selection; 25-24.490,)
F.A.C., Customer Relations; Rules)
Incorporated.)

Docket No. [REDACTED]

Filed: January 16, 1998

AT&T'S PREHEARING STATEMENT

AT&T Communications of the Southern States, Inc. (hereinafter "AT&T"), pursuant to Rule 25-22.038, Florida Administrative Code, and Orders PSC-97-1071-PCO-TI and PSC-98-0006-PCO-TI of the Florida Public Service Commission (hereinafter the "Commission") hereby submits its Prehearing Statement in the above-referenced docket.

A. Witnesses

Witness: Jerry W. Watts Issue: 1

B. Exhibits

Witness: Jerry W. Watts

Exhibit: Title:

JWW-1 1995 FCC Complaint Ratios for Long Distance Companies

FILED
[Signature]
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
[REDACTED] JAN 16 1998
FPSC-RECORDS/REPORTING

C. Basic Position

AT&T does not believe that additional restrictions should be imposed on the PIC change process because the continuing slamming problems experienced by Florida consumers are largely the result of non-compliance with the existing rules. Rather, the Commission can best deter slamming by enforcement of slamming regulations which are not unduly confusing to consumers or burdensome on telecommunication carriers. AT&T supports state regulations which mirror the existing and forthcoming FCC rules. This will ensure consistency in application, implementation, and enforcement. If states adopt separate requirements, consumers would be confused, and national and regional carriers would face huge financial and administrative burdens in dealing with up to 51 differing sets of regulations. These additional costs would ultimately be borne by consumers and the important goal of promoting robust competition in telecommunication markets would be undermined.

D.-F. Positions on the Issues

ISSUE 1: Should additional safeguards be adopted by the Commission to protect consumers from slamming? If so, what safeguards should be adopted?

AT&T's Position: No. The continuing slamming problems experienced by Florida consumers are largely the result of non-compliance with the existing rules and can best be addressed through vigorous enforcement.

AT&T's Witness: Jerry Watts

G. Stipulated Issues None.

H. Pending Motions

AT&T's Request for Temporary and Permanent Protective Order, filed on October 10, 1997.

I. Other Requirements None.

Respectfully submitted



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CERTIFICATE OF SERVICE

Docket No. 970882-TI

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U.S. Mail this 16th day of January 1998, to the following parties:

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