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Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0950

January 28, 1998

Re: Docket No. [REDACTED]
Joint Petition of Robert A. Butterworth, Attorney General, and the Citizens of the State of Florida, by and through the Office of Public Counsel, for initiation of formal proceedings pursuant to Section 120.57(1), Florida Statutes, to investigate the practice of "slamming," i.e. the unauthorized change of a customer's pre-subscribed carrier, and to determine the appropriate remedial measures

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of GTE Florida Incorporated's Amendment to Prehearing Statement for filing in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at (813) 483-2617.

Very truly yours,

Kimberly Caswell

- ACK _____
- AFA _____
- APP 2
- CAF 2
- CMU 2
- CTR _____
- EAG _____
- LEG for
- LIN 5 KC:tas
- OPC _____ Enclosures
- RCV 1
- SEC 1
- WAS _____
- OTH _____

A part of GTE Corporation

DOCUMENT NUMBER-DATE

01516 JAN 28 88

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Rule 25-24.485, F.A.C.,)	Docket No. 970882-T1
Customer Relations; Rules Incorporated)	Filed: January 28, 1998
and Proposed Amendments to Rule)	
25-4.003, F.A.C., Definitions; Rule 25-4.110,)	
F.A.C., Customer Billing; Rule 25-24.490,)	
F.A.C., Interexchange Carrier Selection;)	
Rule 25-24.490, F.A.C., Customer Relations;)	
Rules Incorporated)	

**GTE FLORIDA INCORPORATED'S AMENDMENT
TO PREHEARING STATEMENT**

At the January 23, 1998 prehearing conference, parties were asked to amend their prehearing statements to set forth specific positions on each of the rules proposed in this docket. The proposed rules will, in effect, become the issues for post-hearing briefing. Below, GTE Florida Incorporated (GTEFL) briefly summarizes its positions on particular Rule recommendations.

Rule 25-4.003 Amendments

At this time, GTEFL does not specifically oppose the proposed definitional revisions.

Rule 25-4.110 Amendments

GTEFL opposes the subsection (10)(a) requirement to include each provider's certificate number on the bill. The certificate number would provide no useful information to the customer; in fact, it would likely add confusing detail to the bill from the customer's perspective. GTEFL believes Staff can get this information relatively easily from either the billing LEC or the carrier which passed the charges to the LEC, as appropriate.

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FPSC-RECORDS/REPORTING

GTEFL also opposes (11)(a)3, the billing block option requirement. GTEFL believes this proposal could create more problems than it solves. Beyond the obvious costs of establishing and maintaining a PIN system for over 1.5 million customers, a PIN-based approach lends itself to fraudulent manipulation, possibly by the same providers which engage in intentional slamming today.

Finally, while GTEFL does not necessarily oppose the subsection (13) requirement to give a customer notice of a PIC change on his next bill, GTEFL would need to modify its system to accommodate the particular message, type and placement requirements of this information. The Commission should thus consider whether the addition of this information would be of sufficient value to pass the associated costs on to consumers.

Rule 25-4.118 Amendments

GTEFL again suggests that the Commission should be wary of establishing systems and measures that themselves pose a significant potential for fraud. GTEFL believes that the subsection (8) requirement to credit a customer for 90 days' worth of charges upon a claim of slamming could easily be abused by unscrupulous customers, at the expense of the general body of customers who must pay for such credits.

Rule 25-24.490 Amendments

At this time, GTEFL does not specifically oppose any of the proposed revisions.

New Rule 25-24.845

As a rule, GTEFL believes regulatory requirements should be imposed on all local providers in a nondiscriminatory manner, so the extension of at least these customer relations rules to ALECs is a positive step.

Respectfully submitted on January 26, 1996.

By: Anthony P. Gillman

Kimberly Caswell

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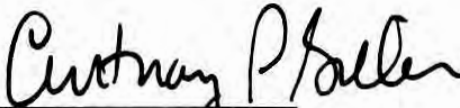
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Amendment to Prehearing Statement in Docket No. 970882-TI were sent via U.S. mail on January 28, 1998, to the parties on the attached list.


for Kimberly Caswell

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