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March 16, 1998

**VIA HAND DELIVERY**

Ms. Blanca Bayó  
Florida Public Service Commission  
Division of Records & Reporting  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 970882-T1

Dear Ms. Bayó:

Enclosed are the original and 15 copies of the Florida Competitive Carriers Association's Post-Hearing Statement of Issues and Positions in the above docket, together with a diskette containing the document in WordPerfect 5.1 format.

I have also enclosed an extra copy of the above document for you to stamp and return to me. Thank you for your assistance.

ACK \_\_\_\_\_

RE: \_\_\_\_\_  
Sincerely,

*(Signature)*  
Vicki Gordon Kaufman

CT: \_\_\_\_\_  
Vicki Gordon Kaufman

EAG: \_\_\_\_\_  
VGK/pw

LEG: \_\_\_\_\_  
Encls.

LIN: 5

OPC: \_\_\_\_\_

RCH: 1

SEC: 1

WAS: \_\_\_\_\_

OTH: \_\_\_\_\_

DOCUMENT NUMBER-DATE  
**MAR 16 1998**  
FPSC-RECORDS/REPORTING

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., Customer Billing; 25- )  
4.118, F.A.C. Interexchange )  
Carrier Selection; 25-24.490, )  
F.A.C., Customer Relations; )  
Rules Incorporated )

Docket No. 970882-TI

Filed: March 16, 1998

**THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S  
POST-HEARING STATEMENT OF ISSUES AND POSITIONS**

- 1. **ISSUE:** Should the Commission adopt the new rule 25-24.845, F.A.C.?  
**FCCA:** \*No position.\*
- 2. **ISSUE:** Should the Commission adopt amendments to rule 25-4.003, F.A.C.?  
**FCCA:** \*No position.\*
- 3. **ISSUE:** Should the Commission adopt amendments to rule 25-24.110, F.A.C.?  
**FCCA:** \*No. There are lower cost regulatory alternatives to the rule proposed by the Commission. The Commission should either adopt the soon-to-be-proposed FCC rules on slamming (FCCA Alternative #1) or incorporate the modifications to the proposed rule filed by FCCA (FCCA Alternative #2). Either of these alternatives will accomplish the purpose of the Commission while imposing lower regulatory costs on the carriers than the rule as proposed.\*
- 4. **ISSUE:** Should the Commission adopt amendments to rule 25-4.118, F.A.C.?  
**FCCA:** \*No. There are lower cost regulatory alternatives to the rule proposed by the Commission. The Commission should either adopt the soon-to-be-proposed FCC rules on slamming (FCCA Alternative #1) or incorporate the modifications to the proposed rule filed by FCCA (FCCA Alternative #2). Either of these

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FPSC-REGULATORY REPORTING

alternatives will accomplish the purpose of the Commission while imposing lower regulatory costs on the carriers than the rule as proposed. \*

5. **ISSUE:** Should the Commission adopt amendments to rule 25-24.490,  
**F.A.C.?**

**FCCA:** \*No. The proposed rule should be modified to delete the reference to subsection (10) under the column captioned "Portions Applicable" to section 24-4.110. An IXC has no way to identify a customer's local carrier. Therefore, it cannot put this information on its bill as this proposed rule seems to require. \*

  
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Attorneys for Florida Competitive  
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## **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the Florida Competitive Carriers Association's Post-Hearing Statement of Issues and Positions has been provided by (\*) hand delivery or U. S. Mail this 16th day of March, 1998 to the following:

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