

**David B. Erwin**  
Attorney-at-Law

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April 2, 1998

Bianca Bayo  
Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

980478-TL

Re: Docket No.:  
Petition of Frontier Communications of the South, Inc.  
For Rule Waiver

Dear Ms. Bayo:

Enclosed find an original and 15 copies of this Petition for Waiver of Rule 25-4.081, F.A.C., by Frontier Communications of the South, Inc.

Sincerely,



David B. Erwin

DBE:jm  
Enclosures  
froAp2

RECEIVED & FILED

  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03863 APR -2 98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Rule Waiver )  
by Frontier Communications of the South )

Docket No.:

Filed: April 2, 1998

PETITION FOR RULE WAIVER

Frontier Communications of the South, Inc. (Frontier), pursuant to Section 120.542(5), F.S., files this Petition for Waiver of Rule 25-4.081, F.A.C., and states as follows:

1. Frontier is subject to regulation by Public Service Commission rules contained in Chapter 25-4, F.A.C.

2. Frontier requests a waiver of Rule 25-4.081, F.A.C., which states as follows:

(1) Access to emergency 911 services shall be provided by the local exchange company to basic local exchange company subscribers.

(2) By July 1, 1997, access to 911 services shall be maintained for the duration of any temporary disconnection for non-payment of a subscriber's local residential service, except that small local exchange companies as defined by Section 364.052(1), Florida Statutes, shall have until July 1, 1998, to comply.

3. Frontier is unable to comply with the rule at the present time. In order to comply, Frontier must make a software change to its Siemens Stromberg Carlson DCO switch, and Frontier has been advised that the software change necessary will not be available until sometime in the first quarter of 1999. See the attached letter from Larry Lassiter, dated March 23, 1998. Frontier believes that no more than 60 days after installation of the software change, Frontier could comply with the rule.

DOCUMENT NUMBER-DATE

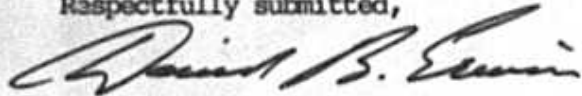
03863 APR-28

FPSC-RECORDS/REPORTING

4. Failure to grant this petition for waiver would create a "substantial hardship," as defined by Section 120.542(2), F.S.

In consideration of the above, Frontier respectfully requests approval of this Petition for Waiver of Rule 25-4.081, F.A.C.

Respectfully submitted,



David B. Erwin  
127 Riversink Road  
Crawfordville, FL 32327  
Phone: 850.926.9331

Attorney for  
Frontier Communications  
of the South, Inc.  
180 S. Clinton Avenue  
Rochester, NY 14646

**frontier**180 South Clinton Avenue  
Rochester, NY 14646

March 23, 1998

Kelly Goodnight  
Regulatory Matters  
Frontier Telephone Group  
180 S. Clinton Avenue  
Rochester, New York 14646

Dear Kelly:

For Frontier Communications of the South, Inc. to comply with Florida Public Service Commission's Order No. PSC98-1540-FOF-TL, Docket No. 960371-TL, to provide access to EB11 service to residential temporary disconnects by July 1, 1998, Frontier will need make a software upgrade to our Siemens Stromberg Carlson DCO switch. Currently, Frontier Communications of the South, Inc. is at Release Level 20.

In a conversation with Mr. Tom Nicholson on March 2, 1998, Siemens Stromberg Carlson has made a verbal commitment that Release Level 22 will contain the software needed to provide EB11 access to residential temporary disconnects. Mr. Nicholson has stated that Release Level 22 is due out sometime in the first quarter of 1999.

Sincerely,

Larry Lassiter  
Network Facilitator  
Frontier Communications of the South, Inc.

TOTAL P.02