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April 29, 1998

Ms. Blanca Bayo
Director of Records and Reporting
Florida Public Service Commission
2450 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: 970109-TI

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of amended Rebuttal Testimony Pages 14 and 15. This amendment is being made to correct the wording "I Don't Know" on Line 14 of Page 14 to "It Doesn't Matter." This is the only correction to the testimony. Page 15 is only being submitted for reformatting purposes.

If you have any questions, please let me know. Thank you for your assistance in this matter.

Sincerely,

Patrick Knight Wiggins
Patrick Knight Wiggins

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AFA _____ Enclosures
APP 1 cc: Parties of Record
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1 unless we obtained prior approval from the Commission.

2 The OPC protested the proposed grant forcing us
3 into this hearing over names we said we would not use.
4 OPC's concern was apparently the same as the one Mr.
5 Poucher mentions in his testimony: someday we might
6 try to use names they don't like, even though we would
7 have to obtain regulatory approval first.

8 Q: To be clear, in what names are you asking that the
9 certificate be granted?

10 A: Because we have been forced to hearing, we would
11 revert to our original application. Specifically, we
12 would like the certificate to be granted under the
13 names "KTNT Communications, Inc. d/b/a I Don't Care"
14 and "KTNT Communications, Inc. d/b/a It Doesn't
15 Matter."

16 Q: Please summarize your rebuttal testimony.

17 A: Mr. Poucher in his testimony argues that our
18 fictitious names are incompatible with the public
19 interest and that we are not fit to be certificated.
20 I disagree.

21 We know that our names are controversial. As I
22 have said publicly before, some people love them and
23 some people don't. But the OPC is basically saying
24 that we are out to cheat people, and that simply is
25 not true. In the zero minus environment we have

1 created a clever name that pops us into the customer's
2 attention. This leads the customer to make an
3 affirmative choice, which may or may not be us. In
4 other markets such as one plus, our names are so
5 distinctive that we will also stand out from the
6 competition.

7 The OPC suggests that we are tricking customers
8 and unfairly competing with other carriers, large and
9 small. But only the OPC and the Attorney General seem
10 to be saying that. To repeat what I said earlier,
11 customers are not complaining, competitors are not
12 complaining, and regulators are not complaining.

13 We applied for our certificate over a year ago.
14 Staff has recommended twice that we be granted a
15 certificate and we have shown by our conduct in this
16 proceeding that we attempt to honor regulatory policy.
17 We have established that we have the technical,
18 managerial, and financial fitness to be certificated.
19 We therefore request that the Commission grant our
20 certificate as soon as possible.

21 Q. Does this conclude your rebuttal testimony?

22 A. Yes it does.

23

24

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