



ORIGINAL

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GTE SERVICE CORPORATION

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August 7, 1998

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

Re: Docket No. 960312-TP  
Proposed amendments to Rules 25-4.002, F.A.C., Application and Scope;  
25-24.600, F.A.C., Application and Scope; 25-24.610, F.A.C., Terms and  
Definitions; Rules Incorporated; 25-24.620, F.A.C., Service Requirements for  
Companies Providing Operator Services; 25-24.630, F.A.C., Rate and Billing  
Requirements; and 25-24.800, F.A.C., Scope

Dear Ms. Bayo:

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

ACK

AEA   
APP  Sincerely,

CAF  Kimberly Caswell/dm  
CMU   
CTR  Kimberly Caswell

EAG  KC:tas  
LEG  Enclosures

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DIVISION OF RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Proposed Amendments to Rules	)	Docket No. 960312-TP
25-4.002, F.A.C., Application and Scope;	)	Filed: August 7, 1998
25-24.600, F.A.C., Application and Scope;	)	
25-24.610, Terms and Definitions; Rules	)	
Incorporated; 25-24.620, F.A.C., Service	)	
Requirements for Companies Providing	)	
Operator Services; 25-24.630, F.A.C., Rate	)	
and Billing Requirements; and 25-24.800,	)	
F.A.C., Scope	)	
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**COMMENTS OF  
GTE FLORIDA INCORPORATED AND  
GTE COMMUNICATIONS CORPORATION**

GTE Florida Incorporated and GTE Communications Corporation (collectively, GTE) file these Comments on the proposed revisions to the Commission's operator services rules. GTE will specifically address the proposed revisions to rule section 25-24.630, the rate and billing requirements.

GTE understands that the Commission is required by statute to establish "maximum rates and charges" for all operator services providers. (Fla. Stat. ch. 364.3376(3).) However, GTE does not believe the proposed rules' approach—dollar and cents caps on per-minute rates and surcharges—is necessary or desirable. Operator services is a competitive offering. As such, the Commission should, to the extent possible, refrain from regulatory intervention that would disrupt market forces. In order to accommodate concerns for competitive efficiency with those for consumer protection, GTE suggests the Commission prescribe caps for per-minute and surcharge rates that do not exceed existing Commission-approved, tariffed rates. Under this scheme, companies could not raise rates any higher than the highest rate on file for the various types of services. In this way, the

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Commission will avoid unduly interfering with companies' marketing and pricing strategies.

For instance, if a company currently has a per-minute charge that is lower than the proposed \$.30 per minute, and a higher person-to-person surcharge than the proposed \$3.25, the company will be prompted to increase its per-minute rate to \$.30 at the same time it is forced to reduce its surcharge. GTE believes this kind of market interference undermines the intended consumer protection effects of the Legislature's surcharge directive. As such, GTE urges the Commission to accept its proposal to refer to currently tariffed rate, rather than dollar-and-cents caps, as a way of meeting the statutory obligation to prescribe maximum rates.

Respectfully submitted on August 7, 1998.

By: Kimberly Caswell / dm  
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Attorneys for GTE Florida Incorporated  
and GTE Communications Corporation

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the Comments of GTE Florida Incorporated and GTE Communications Corporation in Docket No. 960312-TP were sent via U. S. mail on August 7, 1998 to the following:

Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street  
Room 812  
Tallahassee, FL 32399-1400

  
Kimberly Caswell  
Kimberly Caswell