

ORIGINAL

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September 10, 1998

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

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RECORDS AND
REPORTING

Re: Docket No. 980696-TP

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of Frontier Communications of the South, Inc.'s Prehearing Statement, which we ask that you file in the captioned matter.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

RECEIVED & FILED

FPSC-BUREAU OF RECORDS



David B. Erwin

DBE:jm

Copy to: All parties of record
Kelly Goodnight

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DOCUMENT NUMBER-DATE

09884 SEP 10 98

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost of Basic)
Local Telecommunications Services,)
Pursuant to Section 364.025 Florida Statutes)
_____)

Docket No. 980696-TP

Filed: September 10, 1998

PREHEARING STATEMENT
OF FRONTIER COMMUNICATIONS OF THE SOUTH, INC.

Frontier Communications of the South, Inc. (Frontier), through its attorney, files this Prehearing Statement, pursuant to the provisions of Rule 25-2.038, F.A.C., and Order No. PSC-98-1008-PCO-TP, as follows:

- a) Frontier will call one witness: Kelly Goodnight.
- b) Frontier will file one exhibit: an embedded cost study.
- c) The basic position of Frontier is that the determination of the cost of basic local telecommunications service appropriate for establishing a permanent universal service mechanism should be through the use of an embedded cost study for Frontier and other Florida LECs that serve fewer than 100,000 access lines.
- d - g) - Frontier has no position on any of the issues set forth in Order No. PSC-98-1008-PCO-TP, except Issues 6 (a) and 6(c). The Commission should not use a cost proxy model to compute the cost of basic local telecommunications service for LECs that serve fewer than 100,000 access lines. Instead, the Commission should use an embedded cost study approach to determine the cost of basic local telecommunications service for Frontier. Using such an approach, the resulting cost for Frontier is \$56.13 per access line per month.
- h) Frontier has not stipulated to any issues.

DOCUMENT NUMBER-DATE

09884 SEP 10 98

FPSC-RECORDS/REPORTING

- i) Frontier has no pending motions upon which action is sought.
- j) Frontier knows of no requirement of the Prehearing Officer that cannot be complied with.

Respectfully Submitted,



David B. Erwin
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Attorney for
Frontier Communications of the South, Inc.

CERTIFICATE OF SERVICE

I hereby certify that copies of Frontier Communications of the South, Inc.'s Prehearing Statement were sent by U. S. Mail on September 10, 1998 to the parties on the attached list.



David B. Erwin

**CERTIFICATE OF SERVICE
DOCKET NO. 980696-TP**

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