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November 2, 1998

VIA HAND DELIVERY

Ms. Blanca Bayó
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 980696-TP - In re: Determination of the Cost of Basic Local
Telecommunications Service, Pursuant to Section 364.025, Florida
Statutes

Dear Ms. Bayó:

Enclosed are the original and 15 copies of FCCA's Post-Hearing Statement of
Issues and Positions and Post-Hearing Brief to be filed in the above docket.

I have enclosed an extra copy of the above document for you to stamp and
return to me. Please contact me if you have any questions. Thank you for your
assistance.

Sincerely,

Joe McGlothlin
Joseph A. McGlothlin

JAM/jg
Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost of
 Basic Local Telecommunications
 Service, Pursuant to Section 364.025,
 Florida Statutes.

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Docket No. 980696-TP

Filed: November 2, 1998

**FCCA'S POST-HEARING STATEMENT
 OF ISSUES AND POSITIONS AND POST-HEARING BRIEF**

Pursuant to rule 25-22.056, Florida Administrative Code, the Florida Competitive Carriers Association (FCCA) files its Post-Hearing Statement of Issues and Positions and its Post-Hearing Brief.¹

BACKGROUND

The 1998 Legislature directed the Commission to perform several studies in regard to telecommunications matters. The study which is the subject of this docket requires the Commission to determine the total forward-looking cost of providing basic local telecommunications service on a basis no greater than a wire center, using an appropriate cost proxy model. Section 364.025 (4)(b), Florida Statutes.

¹ The following abbreviations are used in this brief. The Florida Public Service Commission is referred to as the Commission. Universal service fund is referred to as USE. BellSouth Telecommunications, Inc. is referred to as BellSouth. GTE Florida Incorporated is referred to as GTE.

SUMMARY OF ARGUMENT

In this proceeding, GTE unabashedly contends it is entitled to USF "support" equal to \$487 million, or roughly 40% of its total intrastate revenues, annually. GTE and BellSouth effectively argue that 100% of their residential lines require USF subsidization. By grossly distorting the economics of residential service, these ILECs hope to convert the USF mechanism into a source of unwarranted corporate welfare; the tool that was intended to be an efficient, targeted support for limited purposes would become instead a huge, overall revenue ratchet designed to insulate the ILECs' present mark-ups and profits from the effects of future competition. They can succeed only by manipulating the Commission and the Legislature into an enormous mismatch of costs and revenues.

It is imperative that the Commission provide the Legislature with the information that will equip it to assess the profitability of residential service accurately. Specifically, an assessment of the need, if any, for universal service support must account for the full range of profitable exchange services.

The appropriate proxy model will recognize that the network facilities which provide local exchange service provide other services as well. The cost analysis must identify the full cost of the typical group of exchange services. In addition, to avoid competitive distortions in the marketplace, the same costing basis must be used to determine UNE prices and the cost of local exchange service.

Because the Legislature has recognized the evolving nature of the quality and scope of "universal service," the Commission has the authority and discretion to define its undertaking in a manner that will enable the Legislature to gauge the need for USF support correctly.

ARGUMENT

ISSUE 1

WHAT IS THE DEFINITION OF THE BASIC LOCAL TELECOMMUNICATIONS SERVICE REFERRED TO IN SECTION 364.025(4)(b), FLORIDA STATUTES?

FCCA: *The Commission has discretion to define "basic local telecommunications service" to include the typical family of services that comprise "basic local telecommunications service" for purposes of assessing the need for a USF subsidy.*

Section 364.025(4)(b), Florida Statutes, describes the Commission's task in this proceeding:

To assist the Legislature in establishing a permanent universal service mechanism, the commission . . . shall determine . . . the total forward-looking cost, based upon the most recent commercially available technology and equipment and generally accepted design and placement principles, of providing basic local telecommunications service. . . .

This assignment carries with it the need to define an economically valid cost methodology and to report the results of the cost study to the Legislature in a way that will allow reasoned and informed debate on the need for an external, governmentally-mandated subsidy fund. (Tr. 606).

Some parties to this proceeding argue that in performing this study for the Legislature the Commission is limited to a consideration of only "dial tone" local service. This is wrong for both legal and practical reasons.

The precise statutory² section with which the Commission is concerned in this docket requires the preparation of a cost study to assist the Legislature in establishing a permanent universal service mechanism. Universal service is defined in this portion of the statute as an "evolving level of access to telecommunications services. . ." Section 364.025(1). Clearly, the Legislature intended the Commission to determine the cost of universal service in this proceeding. (Tr. 616). Equally as clearly, the Legislature has recognized that the scope of service associated with universal service is not a fixed or static concept. It would be inconsistent with the legislative intent to limit the definition of "basic local telecommunications" service, as applied to the legislative mandate underlying this USF proceeding, to the narrow scope of the definition in Section 364.02(2), F.S. That subsection was designed -- not to guide a study of USF methodology -- but to govern the rates an ILEC must freeze when choosing price cap regulation.

The open-ended nature of the Legislature's definition of "universal service" provides the Commission with discretion in defining the object of the cost study at issue here. The Commission should use that discretion to conduct an economically valid cost study that will establish the cost of the typical family of services that make up "basic local telecommunications service" as used in Section 364.025(4)(b). (Tr. 616). To do otherwise would provide the Legislature with much less than a complete picture of the universal service funding issue.

² A specific statutory reference controls over a more general reference. *Florida v. Cobb*, 440 So.2d 65 (Fla. 1st DCA 1983).

As a practical matter, the Commission cannot conduct a cost study and limit it to dial tone -- other services will of necessity be implicated. This is because a large portion of the cost of facilities which provide local exchange service (the loop and the switch) do not provide only local exchange service. These *very same* facilities provide a myriad of other services, including switched access, vertical services and other intraLATA services. Therefore, the Commission cannot determine the cost of dial tone without also including in that cost the functionality which underlies numerous other services. (Tr. 606-607, 693-694).

If the Commission does not provide the Legislature with information regarding these other services as it looks at the cost of basic local telecommunications service, the Legislature may end up comparing the *full* cost of the loop and the switch (which are used to provide services beyond dial tone) to only the price of dial tone local service. This incorrect analysis may result in the conclusion that a government subsidy is needed, even though in reality the customer is actually highly profitable to serve. (Tr. 607). Such a scenario is obviously inappropriate to an analysis of universal service requirements.

To avoid such an erroneous result, the Commission should estimate the total cost of the family of services which the loop and local switch make possible.¹ This approach recognizes that by analyzing the cost of the loop and the local switch, the cost study of necessity includes facilities which provide other, profitable services. Rather than attempting to allocate the cost of these facilities among the services they provide, the study should include the cost of the entire

¹ Another approach would be to attempt to allocate a portion of the cost of these facilities to each revenue producing service. However, this is an inherently arbitrary approach which the FCCA does not recommend. (Tr. 609).

family of services. (Tr. 609). This will facilitate an accurate picture of the costs and revenues which the Legislature must address.

This approach to the cost study reflects the reality of the telecommunications marketplace. As a practical matter, revenues from optional calling and vertical services are available only to the customer's local telephone company (whether that is the incumbent or a new entrant). A customer cannot choose one local company for local phone service and another for vertical services. (Tr. 640). The revenues from all of these services are the revenues any company serving an individual residential customer would expect to receive to offset the cost of serving that customer. (Tr. 691). The revenue potential of a local customer is not determined only on the basis of revenue received for "dial tone" local exchange service: carriers also expect to receive revenues from other services they provide the customer and from access charges imposed on other carriers. (Tr. 610).

A customer's profitability is based on the full cost of the facilities to serve that customer versus the total revenue from the family of services that customer purchases. (Tr. 609, 693). The entire basket of services associated with each customer's line in each wire center is important to determine profitability and the need, if any, for a universal service subsidy. (Tr. 693).

In general, to determine if a subsidy is appropriate, costs must be compared to corresponding revenues. (Tr. 791). A subsidy is necessary only when the total revenues a company expects to receive from customers are inadequate to recover costs. (Tr. 691-692). As the FCC said, "failure to include all revenues received by the carrier could result in substantial overpayment to the carrier."⁴

⁴ FCC Report and Order, CC Docket No. 96-45, par. 20.

An analysis of the distribution of BellSouth's residential local revenues demonstrates the wisdom of looking at the family of services when examining the need for universal service. In a filing with the FCC,⁵ local service revenues were defined to include the entire family of services suggested here. A comparison of the revenue distribution for residential customers who obtained services other than dial tone revealed that approximately 91% of BellSouth's residential customers purchase more than dial tone local service.⁶ (Tr. 612). To exclude these additional revenues from a consideration of the need for a subsidy would not provide a true picture of actual costs and revenues. While the "dial tone" rate may be priced lower than other services to attract subscribers, that does not mean that a governmental subsidy is needed to serve profitable customers.

The same analysis of the distribution of residential local revenues refutes BellSouth's principal argument against including the full cost of the family of services. BellSouth's witness, Dr. Taylor, asserted that, as long as a residential customer can order the local loop by itself, it would be inappropriate to include the cost of anything other than "dial tone service" in the study. (Tr. 1891). Through this witness, BellSouth is simply attempting to lift itself by the theoretical bootstraps of BellSouth's tariff offerings. The fact that BellSouth offers "dial tone" alone does not mean that customers want or use it alone (clearly, the data proves that the vast majority

⁵ This information is for the month of October 1994.

⁶ This percentage is understated because it does not consider access revenues, intralATA toll revenues and included customers with only a partial month's service. (Tr. 612).

expect to use -- and in fact use -- other services as well), or that the costs of the local loop are not germane to the other services that must utilize it.

Finally, and most dramatically, the ILECs' testimony illustrates the need to use the appropriate definition of basic local telecommunications service so as to prevent unwarranted subsidies. For example, GTE believes the USF should guarantee revenues in excess of what it receives today. (Tr. 627-628). With a straight face, GTE asks for a subsidy that is roughly equivalent to 40%-50% of its total intrastate revenues -- about \$487 million annually! (Tr. 629). GTE's claim is fantastic. It misses the point of a universal service fund entirely. The fund's purpose is not to protect GTE's corporate revenues or profit in perpetuity; the purpose is to provide external support in the limited circumstances where network costs are so high they jeopardize subscription. (Tr. 628-629).⁷

In their effort to transform the USF concept into one of corporate entitlements, BellSouth and GTE have turned the concept of "target efficiency" upside down. The USF methodology is supposed to identify, with precision, the high cost areas to serve. Remarkably, BellSouth and GTE claim that they need a subsidy for 100% of their residential lines.⁸ (Tr. 631). The LECs are able to make this claim because they rely on a distorted "dial tone only" analysis. As discussed above, a "dial-tone-only" customer is the exception, not the rule. The commercial

⁷ Revealingly, GTE never explains why it needs a subsidy in Tampa/St. Petersburg, one of the most dense and prosperous regions of the state.

⁸ While GTE makes this argument, it contemporaneously seeks confidential treatment for the details of its economic analysis. The rationale GTE offers for confidentiality is that it doesn't want to divulge to competitors the most lucrative aspects of its residential business! This confirms that -- notwithstanding its demand for a gargantuan subsidy -- GTE understands that its residential customers are profitable. (Tr. 632).

attractiveness of a customer is decided by the customer's total revenue potential, not the revenues collected in the basic local rate. (Tr. 631). Therefore, the only valid comparison to make in determining whether a subsidy is necessary is to compare the total cost to provide a typical package of local services purchased by an average customer to the revenues generated from this package. AT&T witness Mr. Guepe demonstrates that, properly viewed, residential customers are profitable.⁹ (Tr. 695-698). The Commission should calculate and report this cost to the Legislature.

Therefore, the Commission should conduct a cost study that estimates the forward-looking cost for a typical family of services. The cost of this family of services should include the conventional cost of dial tone and the costs associated with a typical spending pattern of optional calling, access service and vertical services. This information plus the average price for this family of services should form the Legislature's basis for determining if any external subsidy is appropriate. (Tr. 614-615).

If the Commission does not follow this recommendation to report the cost of this family of services to the Legislature as the cost of basic local telecommunications service, it should nevertheless report *both* the cost of the family of services and the cost of any more limited basic service definition it adopts. In that way, the Legislature can judge both the relative pricing of dial tone service and the profitability of the average local residential customer and have the information it needs to make an informed decision on the subsidy issue. (Tr. 616).

⁹ See Table 3. (Tr. 698).

ISSUE 2

FOR PURPOSES OF DETERMINING THE COST OF BASIC LOCAL TELECOMMUNICATIONS SERVICE APPROPRIATE FOR ESTABLISHING A PERMANENT UNIVERSAL SERVICE MECHANISM, WHAT IS THE APPROPRIATE COST PROXY MODEL TO DETERMINE THE TOTAL FORWARD-LOOKING COST OF PROVIDING BASIC LOCAL TELECOMMUNICATIONS SERVICE PURSUANT TO SECTION 364.025(4)(b), FLORIDA STATUTES?

FCCA: *The appropriate proxy model is the HAI model applied in a manner that encompasses the cost of facilities used to provide the full family of local exchange services.*

The model chosen by the Commission should have two characteristics. First, it should look at the total cost of providing the entire family of local exchange services, not just dial tone, but all the other things that a typical residential customer purchases. (Tr. 638). Second, the same model should be used to derive universal subsidies, if needed, and network element prices. (Tr. 639).

As to the first point¹⁰, in preparing its study, the Commission should provide the forward-looking cost for the typical family of services. Therefore, it must use a model that can encompass costs like dial tone, optional calling, access service and vertical service. While either model could be run to comply with these requirements, the HAI model is the most appropriate model to use for this purpose.¹¹ (Tr. 685).

¹⁰ This was discussed in detail in Issue 1.

¹¹ The HAI model in evidence in this proceeding has already been run in this way, so that the correct results are before the Commission. (Tr 662-663). If the Commission were decide to use the BCPM model, it would have to be adjusted consistent with the recommended criteria. (Tr. 639). FCC Report and Order, CC Docket No. 96-45, par. 251. (Tr. 687).

As to the second point, the forward-looking costs derived from the HAI model should also be used to establish the price an ILEC charges to provide these same facilities to a competitor as a network element. The same cost analysis should be used to determine universal service subsidy and to establish network element prices. (Tr. 617, 686). If the same methodology is not used, the universal service mechanism would be competitively distorted. (Tr. 687, 702). The FCC encouraged states to use consistent methodologies for setting unbundled network element prices and for determining the level of universal service support.

Competitive neutrality requires that both the UNE-based entrant and the incumbent receive the same effective subsidy (if one is available). If entrants pay network element prices based on one cost analysis, yet subsidies for universal service are calculated from a different cost study, then there would be instances where the subsidy available to the entrant would be either too large or too small. (Tr. 617, 687). Both network element prices and universal service costs should be calculated from a cost study that estimates the forward-looking, efficient cost of the local network and this is exactly the output of the HAI model.¹² (Tr. 687).

Similarly, the geographic unit¹³ used to determine the subsidy should be the same geographic unit used to define network element prices. To do otherwise would provide too little support for a low-cost exchange and too much support for a high-cost exchange. (Tr. 619).

¹² It should be noted that existing UNE rates were not set pursuant to any model proposed in this proceeding. (Tr. 687).

¹³ FCCA advocates providing estimates at the wire center level and this is what the HAI model does. (Tr. 688).

Whatever level of geographic averaging is used, it should be used for both universal service and network element pricing. (Tr. 620).

The fact that the cost study must be forward-looking reduces the significance of the existing network architecture. The forward-looking costs of the existing network are only important if the existing network configuration will be used in the future. Given the rapidly changing technology in the telecommunications industry existing network architecture is not likely to be modeled to determine forward-looking costs. Thus, any forward-looking study must model a "hypothetical" network. (Tr. 622).

Any concern that the proxy model would yield "hypothetical" UNE prices is unwarranted. Universal service cost proxy models begin with the assumption that the location of switches is fixed. Accordingly, the cost being estimated is the forward-looking investment cost relevant to a network with these wire centers. Therefore, there is really nothing hypothetical about the studies. (Tr. 622).

The Commission should consistently apply the same cost methodology to the cost of network facilities used to provide universal service and to establish network element pricing. Only this consistent application will assure the creation of a competitively neutral universal service mechanism. (Tr. 623).

ISSUE 3

FOR PURPOSES OF DETERMINING THE COST OF BASIC LOCAL TELECOMMUNICATIONS SERVICE APPROPRIATE FOR ESTABLISHING A PERMANENT UNIVERSAL SERVICE MECHANISM, SHOULD THE TOTAL FORWARD-LOOKING COST OF BASIC LOCAL TELECOMMUNICATIONS SERVICE PURSUANT TO SECTION 364.025 (4)(b), FLORIDA STATUTES, BE DETERMINED BY A COST PROXY MODEL ON A BASIS

SMALLER THAN A WIRE CENTER? IF SO, ON WHAT BASIS SHOULD IT BE DETERMINED?

FCCA: * No. The wire center is the appropriate level to estimate the costs. Costs should then be aggregated to the same level as UNE prices.*

ISSUE 4

FOR PURPOSES OF DETERMINING THE COST OF BASIC LOCAL TELECOMMUNICATIONS SERVICE APPROPRIATE FOR ESTABLISHING A PERMANENT UNIVERSAL SERVICE MECHANISM, FOR EACH OF THE FOLLOWING CATEGORIES WHAT INPUT VALUES TO THE COST PROXY MODEL IDENTIFIED IN ISSUE 2 ARE APPROPRIATE FOR EACH FLORIDA LEC?

- (A) DEPRECIATION RATES
- (B) COST OF MONEY
- (C) TAX RATES
- (D) SUPPORTING STRUCTURES
- (E) STRUCTURE SHARING FACTORS
- (F) FILL FACTORS
- (G) MANHOLES
- (H) FIBER CABLE COSTS
- (I) COPPER CABLE COSTS
- (J) DROPS
- (K) NETWORK INTERFACE DEVICES
- (L) OUTSIDE PLANT MIX
- (M) DIGITAL LOOP CARRIER COSTS
- (N) TERMINAL COSTS
- (O) SWITCHING COSTS AND ASSOCIATED VARIABLES
- (P) TRAFFIC DATA
- (Q) SIGNALING SYSTEM COSTS
- (R) TRANSPORT SYSTEM COSTS AND ASSOCIATED VARIABLES
- (S) EXPENSES
- (T) OTHER INPUTS

FCCA: *FCCA adopts the position of AT&T.*

ISSUE 5

(A) FOR PURPOSES OF DETERMINING THE COST OF BASIC LOCAL TELECOMMUNICATIONS SERVICE APPROPRIATE FOR ESTABLISHING A PERMANENT UNIVERSAL SERVICE MECHANISM, FOR WHICH FLORIDA LOCAL EXCHANGE COMPANIES MUST THE COST OF BASIC LOCAL TELECOMMUNICATIONS SERVICE BE DETERMINED USING THE COST PROXY MODEL IDENTIFIED IN ISSUE 2?

(B) FOR EACH OF THE LECS IDENTIFIED IN (A), WHAT COST RESULTS FROM USING THE INPUT VALUES IDENTIFIED IN ISSUE 5 IN THE COST PROXY MODEL IDENTIFIED IN ISSUE 2?

FCCA: *No position for purposes of this proceeding.*

ISSUE 6

(A) FOR PURPOSES OF DETERMINING THE COST OF BASIC LOCAL TELECOMMUNICATIONS SERVICE APPROPRIATE FOR ESTABLISHING A PERMANENT UNIVERSAL SERVICE MECHANISM, SHOULD THE COST OF BASIC LOCAL TELECOMMUNICATIONS SERVICE FOR EACH OF THE LECS THAT SERVE FEWER THAN 100,000 ACCESS LINES BE COMPUTED USING THE COST PROXY MODEL IDENTIFIED IN ISSUE 2 WITH THE INPUT VALUES IDENTIFIED IN ISSUE 4?

(B) IF YES, FOR EACH OF THE LECS THAT SERVE FEWER THAN 100,000 ACCESS LINES, WHAT COST RESULTS FROM USING THE INPUT VALUES IDENTIFIED IN ISSUE 4 IN THE COST PROXY MODEL IDENTIFIED IN ISSUE 2?

(C) IF NOT, FOR EACH OF THE FLORIDA LECS THAT SERVE FEWER THAN 100,000 ACCESS LINES, WHAT APPROACH SHOULD BE EMPLOYED TO DETERMINE THE COST OF BASIC LOCAL TELECOMMUNICATIONS SERVICE AND WHAT IS THE RESULTING COST?

FCCA: *No position.*

CONCLUSION

In deciding the USF issue, the Commission should ensure that the model it utilizes looks at the total cost of providing the entire family of local exchange services, including access, vertical services and expanded local calling. These services are provided with the same facilities used for dial tone service. Only if the revenues from such services are included in the analysis can the Commission, and ultimately Legislature, obtain a true picture of the need for government subsidies.

In addition, the model used to develop universal service subsidy information and network element prices should be the same. This will ensure that any subsidy that is provided is competitively neutral.


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by United States mail or hand delivery(*) this **2nd** day of **November**, 1998, to the following parties:

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