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Legal Department

NANCY B. WHITE  
General Counsel-Florida

NOV 30 PM 4: 34

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
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Tallahassee, Florida 32301  
(305) 347-5558

RECORDS AND  
REPORTING

November 30, 1998

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

Re: Docket No. 971627-TP (Ft. White-EAS)

Dear Mrs. Bayó:

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

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White*  
Nancy B. White (BW)

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU *Barrett*
- CTR \_\_\_\_\_ NBW/vf
- EAG \_\_\_\_\_ Enclosures
- LEG 1 cc: All parties of record
- LIN 3 A. M. Lombardo
- OPC \_\_\_\_\_ William J. Ellenberg II
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

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*[Signature]*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

13427 NOV 30 98

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE  
DOCKET NO. 971627-TP (Ft. White-EAS)**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail this 30th day of November, 1998 to the following:

Beth Keating, Esq.  
Staff Counsel  
Florida Public Service Commission  
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Tallahassee, FL 32399-0850  
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One Allied Drive  
Little Rock, AR 72202-2099  
Tel. No. (501) 905-7085

ALLTEL Florida, Inc.  
Mr. Richard H. Brashear  
206 White Avenue, S.E.  
Live Oak, FL 32060-3343  
Tel. No. (904) 364-2517  
Fax. No. (904) 364-4950

Mike Zimmerman  
Route 2, Box 9192  
Fort White, FL 32038  
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Columbia County Board  
of Commissioners  
Frank Albury  
P.O. Drawer 1529  
Lake City, FL 32056-1529  
Tel. No. (904) 755-4100

  
\_\_\_\_\_  
Nancy B. White (ps)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by residents of ) Docket No. 971627-TL  
 Ft. White requesting extended )  
 area service between Ft. White )  
 exchange in Columbia County and )  
 Gainesville exchange in Alachua )  
 County. )  
 \_\_\_\_\_ ) Filed: November 30, 1998

**PREHEARING STATEMENT OF BELL SOUTH TELECOMMUNICATIONS, INC.**

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with the Order Establishing Procedure (Order No. PSC-98-1057-PCO-TL), issued on August 7, 1998, hereby submits its Prehearing Statement for Docket No. 971627-TL.

**A. Witnesses**

BellSouth proposes to call the following witnesses to offer testimony on the issues in this docket:

<u>Witness</u>	<u>Issue(s)</u>
Conrad D. Martin (Direct)	All

BellSouth reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference to be held on December 14, 1998. BellSouth has listed the witnesses for whom BellSouth believes testimony will be filed, but reserves the right to supplement that list if necessary.

**B. Exhibits**

None at this time.

BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

**C. Statement of Basic Position**

BellSouth does not have a position on whether EAS, one-way ECS or another form of toll relief is justified because traffic data on these routes is not available. If the Commission determines that a sufficient community of interest exists, BellSouth is willing to implement Gainesville to Fort White EAS if BellSouth can recover its cost. If one-way interLATA ECS is ordered, BellSouth should charge terminating switched access rates for terminating traffic on these routes.

**D. BellSouth's Position on the Issues**

**Issue 1: Is there a sufficient community of interest on the Ft. White/Gainesville route to justify non-optional extended area service (EAS) as currently defined in Commission Rules or implementing an alternative toll plan?**

Position: BellSouth does not have traffic data available on this route to determine whether a sufficient community of interest exists.

**Issue 2: If a sufficient community of interest is found to exist, what is the economic impact for the subscribers and the involved companies in implementing an alternative plan on the Ft. White/Gainesville route? (Summarize and discuss in detail the alternative toll plan and its rate structure):**

- A) EAS with a 25/25 plan and re-grouping
- B) One-way extended calling service (ECS)
- C) Other (specify)

Position:

- A) No position at this time.
- B) No position at this time.
- C) No position at this time.

**Issue 3: What are the appropriate rates for the alternative toll plan on the Ft. White/Gainesville route?**

Position: If EAS is determined to be appropriate, BellSouth should recover its costs. If one-way ECS is determined to be appropriate BellSouth should charge terminating switched access rates.

**Issue 4: What dialing pattern should be implemented if the Commission determines that toll relief is appropriate?**

Position: No position at this time.

**E. Stipulations**

None.

**F. Pending Motions**

None.

**G. Other Requirements**

None.

Respectfully submitted this 30<sup>th</sup> day of November, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (hw)

c/o Nancy Sims  
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