

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Telephone Company of)
Central Florida, Inc. for Resolution of)
Items Under Dispute in Resale Agreement)
With BellSouth Telecommunications, Inc.)

Docket No. 981052-TP

Filed: December 3, 1998

DIRECT TESTIMONY AND EXHIBITS

OF

ELDER N. RIPPER, III

ON BEHALF OF

THE TELEPHONE COMPANY OF CENTRAL FLORIDA

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PR-10-RECORDS/REPORTING

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Introduction

1 **Q. Please state your name and business address.**

2 A. Elder (Kip) N. Ripper, III, 3599 West Lake Mary Boulevard, Lake Mary, Florida
3 32746.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am the President and CEO of the Telephone Company of Central Florida
6 (TCCF). TCCF resells BellSouth, Sprint and GTE local telephone services.
7 TCCF also resells long distance and billable calling card services. TCCF sells
8 these services to business and residential customers primarily in the state of
9 Florida. TCCF currently uses a third party billing company to directly bill our
10 customers, but has recently contracted with a new vendor to bring the billing in
11 house. TCCF provides its own 24-hour a day 7-day a week customer service.
12 TCCF also maintains its own electronic customer and billing data bases.

13 **Q. Please describe your educational and professional experience.**

14 A. I graduated in 1971 from Case Institute of Technology with a B.S. degree in
15 mechanical engineering. I have taken professional training classes in the following

1 areas of expertise:

2	<u>Switching</u>	<u>System</u>
3	◆ Engineering	s x s
4	◆ Planning	#5 Crossbar
5	◆ Traffic Engineering	#1 ESS
6	◆ Network Design	#2 ESS, #5 ESS, DMS 10, DMS
7		100, DMS 250, DMS 300, DMS 200,
8		SL-1 PBX, Dimension PBX, PBX
9		CBX.

10
11 Transmission Systems

12
13 Old Bell System N Carrier, N-1 Carrier, T-1 Carrier,
14 T/J/R Radio.

15
16 New Technology Microwave, Fiber, ATM, Frame
17 Relay, ISP.
18

19 My professional carrier experience includes nearly 30 years working at or
20 consulting for telecommunications companies. These companies include old Bell
21 System companies, like Ohio Bell and Bell of Pennsylvania. Others include
22 Nortel, GTE and Comsat. My areas of expertise include general management,
23 engineering, planning, design marketing, sales and program management.

24 **Q. On whose behalf are you appearing and what is the purpose of your**
25 **testimony?**

26 A. I am here as the CEO of TCCF. I am appearing to address the issues of
27 BellSouth's lack of support of its ESSX product and whether the Commission
28 should require BellSouth to continue supporting this product for TCCF in its new
29 Resale Agreement. My testimony will cover the ESSX complaint issue, including

1 BellSouth's performance under the current resale agreement and the ESSX
2 arbitration issue, why BellSouth must provide ESSX for resale under the new
3 agreement.

4 **Q. Describe your involvement in the negotiation of the original resale agreement**
5 **with BellSouth.**

6 A. I was primarily responsible for negotiating the resale agreement. It is my
7 understanding that TCCF signed the first resale agreement in Florida with
8 BellSouth.

9 **ESSX Complaint**

10 **Q. Did the original Agreement between TCCF and BellSouth provide for**
11 **TCCF's resale of ESSX?**

12 A. Yes it did. I specifically requested and received language in paragraph III A. of
13 the Agreement that included all Centrex type services in section A. 12 of the
14 Florida BellSouth tariff. Wade Johnson of BellSouth confirmed the validity of
15 this in his letter to me on ESSX resale on July 9, 1996. Exhibit No. ____ (ENR-
16 1). It was confirmed again on March 14, 1997 via Joe Baker's settlement proposal
17 to TCCF. Lastly, Jerry Hendrix confirmed to TCCF in writing BellSouth's ability
18 to order as many ESSX lines as it wanted. Exhibit No. ____ (ENR-2). The
19 prices were also confirmed by BellSouth. Exhibit No. ____ (ENR-3). It just
20 never provided the service.

21 **Q. How important was the resale of ESSX to TCCF's market strategy?**

22 A. It was vital. TCCF's Business Plan called for it to sell primarily ESSX services

1 in the market place. Exhibit No. ____ (ENR-4). This would have given TCCF
2 an edge against all other service providers. It would have allowed TCCF to make
3 a profit on resale of local business dial tone and would also give subscribers a
4 better deal. TCCF could provide ESSX dial tone to a business customer for 1/6th
5 less than the customer paid for a regular business line and TCCF could also make
6 a profit. In addition, TCCF could offer long distance services to its consumers at
7 an additional savings and do it all on one bill in order to provide one-stop
8 shopping for the consumer.

9 Under this scenario, everyone wins: the customer wins via better rates
10 (real competition!), TCCF wins by building a successful business, and BellSouth
11 wins by retaining its revenue and keeping its central offices full and cost effective.
12 However, BellSouth defaulted numerous times on its Resale Agreement with
13 TCCF.

14 **Q. Was BellSouth aware of the importance of ESSX to TCCF's Business Plan?**

15 A. Yes. The frequent and numerous correspondence on this matter (attached to Mr.
16 Koller's testimony) leave no doubt that BellSouth was well aware of the
17 importance of ESSX to TCCF.

18 **Q. What is BellSouth required to deliver under the current Resale Agreement?**

19 A. BellSouth is required to deliver a working ESSX Centrex network. On May 28,
20 1996, TCCF and BellSouth signed the Resale Agreement. On May 29, 1996,
21 BellSouth accepted TCCF's formal service request for 201 line ESSX agreements
22 for 73 months. Exhibit No. ____ (ENR-5). This network is described by

1 Charlotte R. Webb in her letter dated May 31, 1996. Exhibit No. ____ (ENR-6).
2 Nineteen locations (with additional locations to be identified) throughout the state
3 of Florida were selected. However, the promised services were never delivered.
4 As an example, only a few accounts were converted at various times. Most of
5 these were converted by first disconnecting all of the customers' services (some
6 customers lost service for several days, if not a week or more) and then providing
7 new service which was nothing like what was previously in place. BellSouth
8 delivered TCCF flawed service that created numerous service issues. See Exhibit
9 No. ____ (ENR-7) for some examples of the problems TCCF experienced.

10 **Q. Explain the significance of the 73-month ESSX contract you refer to above.**

11 A. The 73-month equipment contract mentioned above is relevant because it is the
12 document recognized by the BellSouth tariff as the official agreement between
13 TCCF and BellSouth. The 73-month term is significant because by tariff it
14 qualifies the leasing party (TCCF) for charges at that tariff rate. Prior to the
15 takeover of the account by the Birmingham, Alabama, team TCCF had entered
16 into an initial agreement for the first ESSX system for the Orlando Magnolia
17 central office. This document was superseded by the letter of agreement between
18 BellSouth and TCCF signed on May 29, 1996, prior to the removal of that service
19 from the active tariff.

20 **Q. How did TCCF intend to provision ESSX under the Agreement?**

21 A. TCCF intended to resell BellSouth ESSX service to its customers. As the
22 Commission will see via the attached exhibits, not only did TCCF contract for the

1 appropriate ESSX service, TCCF also had specific wording added to its resale
2 contract to confirm its intent to resell ESSX. Further, TCCF continually worked
3 with the appropriate BellSouth support personnel to confirm its plan, as the
4 attached exhibits demonstrate. However, BellSouth has never successfully
5 implemented the agreed upon plan.

6 **Q. Under the current resale agreement, how did the resale of ESSX proceed?**

7 A. Mr. Koller provides a detailed chronology of the numerous problems which TCCF
8 experienced trying to resell ESSX and I will not repeat those here. Suffice it to
9 say that since the signing of our original Resale Agreement with BellSouth up to
10 the present, BellSouth has failed to provision ESSX for resale and appears to have
11 done everything in its power to prevent TCCF from being successful in the
12 market. Such actions include everything from continual delays in provisioning to
13 cutting off customers to numerous changes in the BellSouth Account Team. As
14 recently as November 25 of this year, BellSouth ignored critical change orders on
15 existing ESSX customers that resulted in three of our largest customers losing long
16 distance service for over 24 hours.

17 **Q. Describe the problems caused by the frequent personnel changes on the**
18 **BellSouth ESSX Account Team.**

19 A. While TCCF continually attempted to work with BellSouth personnel to provision
20 ESSX, the account management team responsible for ESSX changed at least 4
21 times over a 2-year period. Each team seemed to have no idea of the work done
22 or promises made by the prior team.

1 Because personnel was continually changing, it was very difficult to make
2 progress on ESSX implementation. Each new team had to be briefed as to where
3 in the process we were and then had to check with prior team members or other
4 BellSouth management personnel before making any decisions. There just was no
5 continuity and this made for a very frustrating situation as TCCF tried to move
6 forward with its Business Plan.

7 The Account Team in charge at any given time implemented procedures
8 and undertook activities pursuant to the goals of that team as it related to the
9 implementation of ESSX. Each team acted within the guidelines as they
10 understood them, but ignored or discarded previous guidelines set forth by the
11 previous team as if we were starting all over each time a team transitioned to the
12 forefront.

13 **Q. What effect has BellSouth's inability to provision ESSX for resale had on**
14 **TCCF?**

15 A. The answer is obvious. TCCF has not been able to meet its financial Business
16 Plan. TCCF has sold its Metro Service to its subscribers for two years. This
17 service is the same as ESSX; it just costs more! In doing so, TCCF has sold
18 below its costs since it has been forced to provide its customers with standard
19 BellSouth services that costs TCCF nearly twice as much per line. See Exhibit
20 No. ____ (ENR-8).

21 During the past 5 months, TCCF has been forced to adjust its pricing to
22 its customers (I thought competition was supposed to reduce customer rates via

1 competition), thus losing a large portion of them back to BellSouth because we
2 cannot give them the promised services and pricing. So not only has BellSouth
3 hurt our profitability, it has also put us in a position of losing much of our
4 customer base because we have had to change our pricing. Further, customers do
5 not believe in us and we have lost our reputation as solid providers.

6 **Q. What effect have BellSouth's actions had on consumers?**

7 A. As this Commission is well aware, the purpose of the Telecommunications Act of
8 1996 is to bring local competition to consumers. In order to do so, the Act
9 requires, among other things, that LEC services be available for resale and requires
10 that resale occur on a fair and nondiscriminatory basis. What has occurred in
11 TCCF's case is the very antithesis of what the Act requires. Competition has been
12 thwarted at every turn and the benefits of competition have not been available to
13 consumers.

14 **Q. Why is it important for the Commission to understand the entire series of**
15 **events surrounding TCCF's attempt to resell ESSX under its current Resale**
16 **Agreement?**

17 A. The background of the current dispute is important to put the issues in this case
18 in context. Though the Telecommunications Act of 1996 requires BellSouth to
19 offer ESSX for resale, BellSouth has thwarted TCCF's ability to do so at every
20 turn for the past 2 years. It has not provisioned the service appropriately, and it
21 has been the cause of lengthy delays resulting in customer losses. BellSouth's
22 activities have resulted in just the opposite of the result anticipated by the Act --

1 the advent of local competition. BellSouth's actions have caused customers to
2 return to or stay with BellSouth, and TCCF's ability to do business in Florida has
3 been greatly damaged as a result.

4 **Q. Didn't TCCF and BellSouth enter into a settlement regarding ESSX issues?**

5 A. Yes. On March 14, 1997 TCCF and BellSouth entered into a settlement.

6 **Q. Doesn't this settlement take care of TCCF's concerns described above?**

7 A. No, for two reasons. First, when TCCF entered into the settlement, BellSouth
8 promised the ESSX problems would be remedied. As the detailed discussion
9 above (and Mr. Koller's testimony) indicate, nothing has changed! BellSouth is
10 still not appropriately provisioning ESSX.

11 Second, problems with ESSX have continued from March 14, 1997 to the
12 present. That period is not covered by the settlement. We have been experiencing
13 delays as recently as November 11, 1998. Exhibit No. ____ (ENR-9).

14 **Q. What action should the Commission take in regard to TCCF's ESSX
15 complaint?**

16 A. First and fundamentally, the Commission should use its regulatory powers to
17 ensure that the Act's goals are met. It should be sure that BellSouth complies
18 with its obligations under the Act so that local competition can develop in Florida.

19 Due to BellSouth's failure to honor its current Resale Agreement for
20 ESSX, the Commission should order BellSouth to allow TCCF to resell ESSX
21 services for a period of at least 18 months from the execution of the new Resale
22 Agreement so as to correct BellSouth's lack of performance over the last 3 years.

1 This would give TCCF the opportunity to build its customer base to a level it
2 would be at today if BellSouth had properly provisioned ESSX as the original
3 Resale Agreement requires.

4 In addition, the Commission should require BellSouth to support and
5 provide ESSX services today and in the future. Though BellSouth may argue that
6 the more appropriate product to provide to TCCF is MultiServ, ESSX is the same
7 product, only unbundled. Alternatively, BellSouth should offer its new product,
8 MultiServ to TCCF at the same price points. The Commission should also ensure
9 that there is no limitation on order flow. (In the past BellSouth has suggested it
10 can only do very small sets of orders).

11 Finally, in order to monitor BellSouth's progress (and perhaps provide an
12 incentive for compliance), BellSouth should provide a monthly status report to the
13 Commission.

14 **ESSX Arbitration**

15 **Q. Is TCCF entitled to have ESSX in the new Resale Agreement?**

16 A. Yes.

17 **Q. Please explain.**

18 A. BellSouth never provisioned ESSX as required under the current Resale
19 Agreement. To remedy this, it must be included in the new Agreement. This is
20 the only remedy TCCF has. Further, to remedy BellSouth's failure to perform,
21 ESSX should be available to current customers until the 73-month agreements
22 expire under the current tariff provisions. It should also be available to new

1 customers for at least 18 months to replace the time BellSouth denied TCCF
2 access to the product via numerous delays and failures described above.

3 **Q. What requirements should the Commission place on BellSouth to ensure that**
4 **ESSX is provided appropriately under the new Agreement?**

5 A. The new Agreement should provide for the support of all services through the 73-
6 month contract period for all users currently on the system. For a period of at
7 least 18 months, BellSouth should be required to provide new ESSX services to
8 TCCF subscribers to allow it to carry out its Business Plan. BellSouth has done
9 everything in its power to delay the implementation of ESSX by TCCF. The
10 Commission should ensure that this does not occur under the new Agreement.

11 **Q. Has BellSouth offered to provide TCCF with MultiServ in place of ESSX?**

12 A. Yes.

13 **Q. What is the difference between ESSX and MultiServ?**

14 A. MultiServ and ESSX service utilize the same central offices for providing services.
15 The primary difference is that ESSX is an unbundled service offering using over
16 1800 USOC codes for implementation and administration, and MultiServ uses
17 approximately 400 USOC codes to provide the same central office based services.
18 The administrative advantage of MultiServ does not offset the cost differential.
19 Exhibit No. ____ (ENR-10).

20 **Q. Could MultiServ be used in place of ESSX?**

21 A. Yes. MultiServ could be utilized in place of the existing ESSX arrangement.
22 This service offering provides all of the feature and operational capability of the

1 ESSX service and also offers additional features and services. The bundled
2 arrangement of MultiServ provides a wide variety of features in an easy to use
3 format and, administratively, it provides additional benefits with less effort.

4 **Q. Then what is the problem with TCCF reselling MultiServ?**

5 A. The primary drawback to this service is the cost involved. Comparative systems,
6 including size and features, result in a 40% increase in cost to TCCF of MultiServ
7 when compared to a similar ESSX system. This increase continues to grow as the
8 system increases in size. To be fair, BellSouth should offer TCCF a special
9 contract based on term and volume commitment that would allow TCCF to receive
10 the same price points as ESSX if it must substitute MultiServ for the ESSX
11 service it was never able to resell.

12 **Q. Is TCCF willing to accept MultiServ in place of ESSX for resale?**

13 A. Yes, but only at the same price points. TCCF could sign a term and volume
14 commitment that would justify the special pricing.

15 **Q. Does this conclude your direct testimony?**

16 A. Yes.

ELDER N. RIPPER, III

EXHIBIT NOS. _____ (ENR-1 - ENR-10)



BellSouth Access Customer Sales
South E4E1
3535 Colonnade Parkway
Birmingham, Alabama 35243

Wade Johnson
Regional Account Executive
(205) 977-8855
(205) 977-0037 FAX

July 9, 1996

Mr. Kip Ripper, President
Telephone Company of Central Florida, Inc.
3551 W. Lake Mary Boulevard, Suite 210
Lake Mary, Florida 32746

Dear Kip:

Pursuant to the passage of the Federal Telecommunications Act of 1996 as well as changes to many state statutes and rules, many telecommunications companies, including the Telephone Company of Central Florida, Inc., are authorized to provide local exchange telecommunications services to end user customers. BellSouth and the Telephone Company of Central Florida, Inc. have entered into a contractual agreement whereby the Telephone Company of Central Florida may purchase BellSouth's telecommunications services, such as BellSouth's ESSX(r) service, for resale purposes.

The resale agreement does not include any license or permission to utilize BellSouth's trademarks or name in conjunction with the marketing or sale of the services.

Sincerely,

A handwritten signature in cursive script that reads "Wade".



BellSouth Telecommunications, Inc.
Room 34531 BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

April 18, 1997

Mr. Elder "Kip" Ripper
Telephone Company of Central Florida
Suite 210
3551 West Lake Mary Blvd.
Lake Mary, Florida

Dear Kip:

This letter is to follow-up on our conversations relative to your request for additional ESSX lines; and the language contained in the Resale Agreement relative to ported numbers for non-paying customers.

Pursuant to your letter of intent dated May 29, 1996, and in compliance with the Resale Agreement entered into between TCCF and BellSouth effective May 28, 1996, BellSouth will honor your request for additional ESSX lines.

With regards to the issue dealing with ported numbers, BellSouth is still exploring alternative options, however, we have been unsuccessful in identifying a workable option. Attached for your review and comments is a copy of a more comprehensive Resale Agreement. I would like to discuss this issue with you further and will contact you in the next couple of days.

I look forward to speaking with you again soon.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jerry Hendrix".

Jerry Hendrix
Director-Interconnection Services

Attachment

cc: Bill French

ENR Limited, INC.
The Telephone Company of Central Florida
Orlando, Florida

DMS ESSX Rates

Qty.	Item Description	Non Recurring		73 Months	
		Per Item	Total	Per Item	Total
1	Service Establishment Charge for Digital ESSX System	\$1,500.00	\$ 1,500.00	\$ -	
20	Flat Rate Network Access Register, Combination			\$ 16.96	\$ 339.20
20	Hunting on NARS			\$ 10.24	\$ 204.80
20	Network Access Limiter, per NAR			\$ -	
20	Surcharge for Hearing/Speech Impaired			\$ 0.10	\$ 2.00
20	FCC End User Line Access Charge			\$ 6.00	\$ 120.00
1	Digital Facility Group			\$ -	\$ -
1	DS-1 Termination, Digital P/DS1 Circuit Termination	\$78.00	\$ 78.00	\$ 510.00	\$ 510.00
24	DS-1 Termination, Digital P/DS0 Channel Activated	\$36.00	\$ 864.00	\$ -	\$ -
201	Digital ESSX Main Stations, up to 2.5 miles			\$ 4.90	\$ 984.90
201	Flat Rate Intercom, per Digital ESSX Main Station			\$ 10.10	\$ 2,030.10
1	DECAS, per System	\$1,100.00	\$ 1,100.00	\$ 7.25	\$ 7.25
201	DECAS, per Digital Main Station			\$ 0.20	\$ 40.20
41	Call Forwarding - Busy Line, per group of 5 Digital Main Stations	\$3.00	\$ 123.00	\$ 0.35	\$ 14.35
41	Call Forwarding - Don't Answer, per group of 5 Digital Main Station	\$3.00	\$ 123.00	\$ 0.40	\$ 16.40
41	Call Forwarding - Variable, per group of 5 Digital Main Station	\$3.00	\$ 123.00	\$ 0.30	\$ 12.30
41	Call Hold, per group of 5 Digital Main Stations	\$5.10	\$ 209.10	\$ 0.25	\$ 10.25
50	Call Pickup Group, per Group			\$ -	\$ -
41	Call Pickup, per group of 5 Digital Main Stations	\$3.00	\$ 123.00	\$ 0.20	\$ 8.20

ENR Limited, INC.
 The Telephone Company of Central Florida
 Orlando, Florida

DMS ESSX Rates

Qty.	Item Description	Non Recurring		73 Months	
		Per Item	Total	Per Item	Total
41	Threeway Calling, Consultation Hold, Call Transfer, per group of 5 Digital Main Stations	\$3.00	\$ 123.00	\$ 5.10	\$ 209.10
1	Automatic Route Selection - Basic Common Equipment, per System	\$215.00	\$ 215.00	\$ 16.00	\$ 16.00
2	ARS Route Selection Pattern, per Pattern	\$88.00	\$ 176.00	\$ 0.70	\$ 1.40
2	Trunk Group Terminated in ARS, per Trunk Group	\$26.00	\$ 52.00	\$ 2.05	\$ 4.10
2	Six (6) Digit Screening, per Six (6) Digit List	\$120.00	\$ 240.00	\$ -	\$ -
1	Assumed Dial "9", per System	\$75.00	\$ 75.00	\$ -	\$ -
201	Assumed Dial "9", per Digital Main Station	\$12.25	\$ 2,462.25	\$ 0.50	\$ 100.50
1	Line Connection Charge, First Line	\$56.00	\$ 56.00		
200	Line Connection Charge, Each Additional Line	\$12.00	\$ 2,400.00		
	TOTAL		\$ 10,042.35		\$ 4,631.05

Centrex Business Plan

The Telephone Company of Central Florida 1997

	March	April	May	June	July	August	September	October	November	December	January	February	Total
Revenue													
Local Access	39,528	130,971	229,520	334,819	469,886	598,199	626,877	754,157	874,679	965,236	1,119,579	1,266,205	7,409,457
Local Message Units	-	-	-	-	-	-	-	-	-	-	-	-	-
Local Business Line Features	15,232	50,471	88,447	129,025	181,074	230,520	277,494	331,119	382,063	430,460	489,937	546,440	3,152,282
Long Distance	45,240	149,898	262,688	383,204	537,788	684,644	824,157	983,424	1,134,728	1,278,466	1,455,113	1,622,927	9,362,277
Total Revenue	100,000	331,340	580,656	847,048	1,188,748	1,513,363	1,728,327	2,068,700	2,391,470	2,674,163	3,064,629	3,435,572	19,924,016
Product Costs													
Local Access	84,950	226,486	311,071	400,277	544,068	631,934	715,407	844,899	935,426	1,021,428	1,178,418	1,278,824	8,173,188
Local Message Units	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Distance	25,118	81,070	138,705	200,242	280,327	354,496	424,957	506,736	583,152	655,748	746,975	831,729	4,829,256
Cost of Access	2,285	7,571	13,267	19,354	27,181	34,578	41,624	49,688	57,309	64,569	73,491	81,988	472,842
Bad Debt 3%	3,000	9,940	17,420	25,411	35,862	45,401	51,850	62,061	71,744	80,225	91,939	103,067	597,720
Billing	3,292	10,907	19,114	27,884	39,132	49,818	59,970	71,559	82,568	93,027	105,881	118,092	681,243
Total Product Costs	118,645	335,974	499,577	673,168	926,350	1,116,227	1,293,807	1,534,922	1,730,200	1,914,996	2,196,703	2,413,679	14,754,250
Gross Margin	(18,645)	(4,634)	81,079	173,880	262,398	397,136	434,520	533,777	661,270	759,167	867,926	1,021,894	5,169,766
Production Costs													
Provisioning	10,000	11,600	13,050	14,500	18,850	18,850	18,850	21,750	21,750	21,750	26,100	26,100	223,150
Client Services 2.00	677	2,243	3,931	5,734	8,048	10,245	12,333	14,716	16,981	19,132	21,775	24,286	140,101
Total Production Costs	10,677	13,843	16,981	20,234	26,898	29,095	31,183	36,466	38,731	40,882	47,875	50,386	363,251
Contribution Margin	(29,322)	(18,478)	64,098	153,645	235,500	368,041	403,337	497,311	622,539	718,285	820,051	971,508	4,806,515
Sales Costs													
Marketing Collateral	8,000	9,000	10,000	13,000	13,000	13,000	15,000	15,000	15,000	18,000	18,000	18,000	185,000
Agent Commission - LD 12.5%	3,980	9,369	16,418	23,950	33,812	42,790	51,510	61,464	70,920	79,904	90,945	101,433	586,275
Direct Sales 1 per 5 TM	20,000	20,000	20,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	330,000
Telemarketing Cost 25.00	86,600	86,600	86,600	129,900	129,900	129,900	129,900	129,900	129,900	129,900	129,900	129,900	1,428,900
Total Sales Costs	118,580	124,969	133,018	196,850	206,512	215,690	226,410	236,364	245,820	257,804	268,845	279,333	2,510,175
Direct Margin	(147,882)	(143,446)	(68,920)	(43,205)	28,988	152,350	176,927	260,947	376,719	460,481	551,207	692,175	2,296,340
Support Costs													
Legal & Regulatory 60K	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	60,000
Fixed Overhead	15,000	15,000	15,000	15,000	15,000	15,000	30,000	30,000	30,000	30,000	30,000	30,000	270,000
Overhead 10%	10,000	33,134	58,068	84,705	118,875	151,336	172,833	206,870	239,147	267,416	306,463	343,557	1,992,402
Total Support Costs	30,000	53,134	78,066	104,705	138,875	171,336	207,833	241,870	274,147	302,416	341,463	378,557	2,322,402
Income Before Tax	(177,882)	(196,580)	(146,986)	(147,910)	(109,886)	(18,986)	(30,906)	19,077	102,572	158,065	209,744	313,617	(26,061)
Cumulative Cash Flow	(177,882)	(374,462)	(521,448)	(669,358)	(779,244)	(798,230)	(829,136)	(810,059)	(707,487)	(549,423)	(339,679)	(26,061)	
Gross Margin %		-1%	14%	21%	22%	26%	25%	26%	28%	28%	28%	30%	26%
EBIT %		-59%	-25%	-17%	-9%	-1%	-2%	1%	4%	6%	7%	9%	0%

Docket No. 981052-TP
Exhibit # ____ (ENR-4)

**Centrex Business Plan
The Telephone Company of Central Florida 1998**

	March	April	May	June	July	August	September	October	November	December	January	February	
selemarketers		30	30	30	30	30	30	30	30	30	30	30	
oses/Day/Seat		1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	
alls/Day/Seat	150	150	150	150	150	150	150	150	150	150	150	150	
otal Calls		90000	90000	90000	90000	90000	90000	90000	90000	90000	90000	90000	
ew Customers Telemarketing		900	900	900	900	900	900	900	900	900	900	900	
ew Customers Agent	338	900	900	900	900	900	900	900	900	900	900	900	
otal New Customers	338	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	
rosion Rate per Month	5%												
Customers On-Line		13,336	14,469	15,546	16,568	17,540	18,463	19,340	20,173	20,964	21,716	22,430	23,109

amp Period - 1 Month to provision
usiness Lines/Customer

Pricing Assumptions

ocal Access per Business Line
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ocal Business Line Features
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Total Revenue per Line

Cost Assumptions

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rovisioning per Customer
rovisioning per Line

Centrex Business Plan
The Telephone Company of Central Florida 1998

	March	April	May	June	July	August	September	October	November	December	January	February	Total
Revenue													
Local Access	1,288,724	1,409,378	1,523,412	1,572,775	1,686,231	1,794,014	1,873,053	1,970,328	2,062,738	2,115,496	2,198,897	2,278,127	21,773,172
Local Message Units	-	-	-	-	-	-	-	-	-	-	-	-	-
Local Business Line Features	600,118	651,112	699,557	745,579	789,300	830,835	870,293	907,778	943,390	977,220	1,009,359	1,039,891	10,064,432
Long Distance	<u>1,782,351</u>	<u>1,933,803</u>	<u>2,077,683</u>	<u>2,214,369</u>	<u>2,344,221</u>	<u>2,467,580</u>	<u>2,584,771</u>	<u>2,686,102</u>	<u>2,801,867</u>	<u>2,902,344</u>	<u>2,997,796</u>	<u>3,088,477</u>	<u>29,891,364</u>
Total Revenue	3,671,193	3,994,292	4,300,652	4,532,723	4,819,751	5,092,429	5,328,117	5,574,208	5,807,995	5,995,060	6,208,052	6,406,495	61,728,968
Product Costs													
Local Access	1,374,210	1,464,827	1,550,912	1,632,694	1,710,388	1,784,194	1,854,311	1,920,922	1,984,203	2,044,320	2,101,431	2,155,687	21,578,096
Local Message Units	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Distance	912,248	988,737	1,061,404	1,130,437	1,196,019	1,258,321	1,317,509	1,373,737	1,427,153	1,477,899	1,526,108	1,571,906	15,241,477
Cost of Access	90,018	97,667	104,934	111,837	118,395	124,825	130,544	136,167	141,508	146,583	151,404	155,984	1,509,665
Bad Debt 3%	110,136	119,829	129,020	135,982	144,593	152,773	159,844	167,226	174,240	179,852	186,182	192,195	1,851,869
Billing	<u>129,692</u>	<u>140,713</u>	<u>151,182</u>	<u>161,128</u>	<u>170,576</u>	<u>179,553</u>	<u>188,080</u>	<u>196,181</u>	<u>203,877</u>	<u>211,188</u>	<u>218,134</u>	<u>224,732</u>	<u>2,175,036</u>
Total Product Costs	2,616,302	2,811,772	2,997,451	3,172,077	3,339,989	3,499,466	3,650,287	3,794,233	3,930,982	4,059,842	4,183,258	4,300,503	42,356,142
Gross Margin	1,054,891	1,182,520	1,303,201	1,360,645	1,479,783	1,592,963	1,677,830	1,779,975	1,877,013	1,935,218	2,022,795	2,105,992	19,372,826
Production Costs													
Provisioning	26,100	26,100	26,100	26,100	26,100	26,100	26,100	26,100	26,100	26,100	26,100	26,100	313,200
Client Services 2.00	<u>26,672</u>	<u>28,938</u>	<u>31,091</u>	<u>33,137</u>	<u>35,080</u>	<u>36,926</u>	<u>38,680</u>	<u>40,346</u>	<u>41,928</u>	<u>43,432</u>	<u>44,860</u>	<u>46,217</u>	<u>447,308</u>
Total Production Costs	52,772	55,038	57,191	59,237	61,180	63,026	64,780	66,446	68,028	69,532	70,960	72,317	760,508
Contribution Margin	1,002,119	1,127,482	1,246,009	1,301,409	1,418,603	1,529,937	1,613,050	1,713,529	1,808,985	1,865,686	1,951,834	2,033,675	18,612,318
Sales Costs													
Marketing Collateral	18,000	18,000	18,000	18,000	18,000	18,000	18,000	18,000	18,000	18,000	18,000	18,000	216,000
Agent Commission - LD 12.5%	111,397	120,863	129,855	138,398	146,514	154,224	161,548	168,506	175,117	181,396	187,362	193,030	1,868,210
Direct Sales 1 per 5 TM	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	360,000
Telemarketing Cost 25.00	<u>129,900</u>	<u>129,900</u>	<u>129,900</u>	<u>129,900</u>	<u>129,900</u>	<u>129,900</u>	<u>129,900</u>	<u>129,900</u>	<u>129,900</u>	<u>129,900</u>	<u>129,900</u>	<u>129,900</u>	<u>1,558,800</u>
Total Sales Costs	289,297	298,763	307,755	316,298	324,414	332,124	339,448	346,406	353,017	359,296	365,262	370,930	4,003,010
Direct Margin	712,823	828,719	938,254	985,110	1,094,189	1,197,813	1,273,602	1,367,123	1,455,968	1,506,389	1,586,572	1,662,745	14,609,308
Support Costs													
Legal & Regulatory 60K	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	120,000
Fixed Overhead	60,000	60,000	60,000	60,000	60,000	60,000	60,000	60,000	60,000	60,000	60,000	60,000	720,000
Overhead 10%	<u>367,119</u>	<u>399,429</u>	<u>430,065</u>	<u>453,272</u>	<u>481,975</u>	<u>509,243</u>	<u>532,812</u>	<u>557,421</u>	<u>580,800</u>	<u>599,506</u>	<u>620,805</u>	<u>640,650</u>	<u>6,172,897</u>
Total Support Costs	437,119	469,429	500,065	553,272	681,975	609,243	662,812	687,421	710,800	759,506	780,805	800,650	7,552,897
Income Before Tax	275,703	359,290	438,189	431,838	512,214	588,570	610,790	679,702	745,169	746,883	805,967	862,086	7,056,411
Cumulative Cash Flow	249,642	608,932	1,047,120	1,478,959	1,991,172	2,579,743	3,190,533	3,870,235	4,615,404	5,362,287	6,166,254	7,030,349	
Gross Margin %	29%	30%	30%	30%	31%	31%	31%	32%	32%	32%	33%	33%	31%
EBIT %	8%	9%	10%	10%	11%	12%	11%	12%	13%	12%	13%	13%	11%

Centrex Business Plan
The Telephone Company of Central Florida 1997

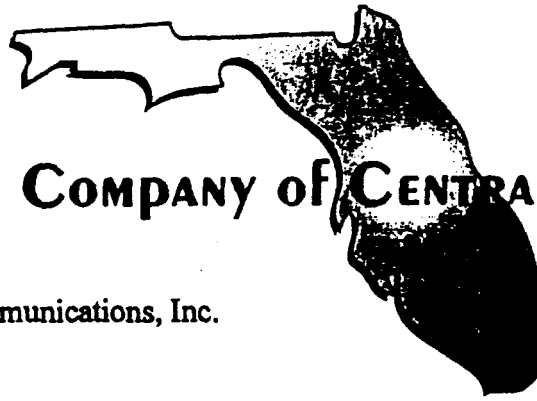
	March	April	May	June	July	August	September	October	November	December	January	February
Telemarketers	20	20	20	30	30	30	30	30	30	30	30	30
Closes/Day/Seat	1	1.25	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5
Calls/Day/Seat	150	150	150	150	150	150	150	150	150	150	150	150
Total Calls	60000	60000	60000	90000	90000	90000	90000	90000	90000	90000	90000	90000
New Customers Telemarketing	400	500	600	900	900	900	900	900	900	900	900	900
New Customers Agent	338	400	400	400	400	400	600	600	600	900	900	900
Total New Customers	338	800	900	1000	1300	1300	1500	1500	1500	1800	1800	1800
Erosion Rate per Month	5%											
# Customers On-Line	338	1,122	1,965	2,867	4,024	5,123	6,167	7,358	8,490	9,566	10,887	12,143
Ramp Period - 1 Month to provision Business Lines/Customer	4.5											

Pricing Assumptions

Local Access per Business Line	25.95	Months 6 and 12 are free for local access.
Local Message Units	0.00	Agents get paid on long distance revenue only.
Local Business Line Features	10.00	
Long Distance Rate per Minute	0.099	
Minutes per Line	300	
Long Distance Revenue per Line	29.7	
Total Revenue per Line	66.65	

Cost Assumptions

Local Access Installation	38.00	Per line
Local Access per Business Line	17.77	
Local Message Units	0.00	
Local Business Line Features	0.00	
PIC Fee	1.49	Per line
Long Distance Rate per Minute	0.05	
Access per Minute	0.005	
Billing Cost per Minute	0.0035	
Billing Cost per Customer	5.00	
Provisioning per Customer	10.00	
Provisioning per Line	1.00	



Telephone Company of Central Florida, Inc.

May 29, 1996

Bell South Telecommunications, Inc.
Rich Dender
South E4E1
3535 Colonnade Parkway
Birmingham, Alabama 35243

Dear Rich:

I'm very pleased with the assistance I've been receiving from your people. Ms. Webb and Mr. Johnson have been extremely helpful. I do look forward to a very long and profitable relationship with Bell South.

I need your assistance with an issue that has come up today. I have been asking the local Bell South Sales Executive here in Orlando about services in other locations. I found out today that all Essx services are to be replaced by MultiServ tomorrow (May 30th). I've been trying since the first week in February to get quotes on the following Bell South Co. locations in Florida.

<u>LOCATION</u>	<u>SWITCH</u>
1.Orlando Magnolia	D100/1ESS
2.Orlando Pine Hills	5ESS
3.Cocoa Main	5ESS
4.West Palm Beach	D100/1ESS
5.Vero Beach	5ESS
6.Melbourne	5ESS
7.West Hollywood	5ESS
8.Ft. Lauderdale Main	D100
9.Ft. Lauderdale Oakland	5ESS
10.Jacksonville San Marco	D100
11.Jacksonville Clay St.	D100
12.NDAD Golden Glades	D100
13.Miami Grande	5ESS
14.Miami Airport	D100
15.Miami Hialeah	5ESS
16.Miami Canal	D100
17.Miami Beach	5ESS
18.Key West	5ESS
19.Gainesville Main	5ESS

3551 W. LAKE MARY BOULEVARD, SUITE 210 • LAKE MARY, Florida 32746
PHONE (407) 328-5002 • FAX (407) 321-1454



TELEPHONE COMPANY of CENTRAL Florida, INC.

Since your local commercial representative did not assist me in my requests, I would ask that this letter serve as my formal service request or letter of election for 201 line Essx agreements for a term of 73 months at each of the above listed locations. I believe I must make this request today or lose the opportunity to order at the existing tariffed Essx rates. Call me if you have any questions.

Sincerely,



Kip Ripper
President

BellSouth Access Customer Sales
South E4E1
3535 Colonnade Parkway
Birmingham, Alabama 35243

Wade Johnson
Regional Account Executive
(205) 977-8955
(205) 977-0037 FAX

May 29, 1996

Elder "Kip" Ripper
The Telephone Company of Central Florida
3551 W. Lake Mary Blvd.
Suite 210
Lake Mary, FL 32746

Dear Kip:

This is to confirm that in today's conference call between you, Charlotte Webb and me, we discussed the following points:

- (1) The Florida ESSX tariff is due to change on May 30, 1996;
- (2) You have been working with the BellSouth Commercial Marketing Sales group in an effort to order ESSX service in approximately fifteen Florida cities;
- (3) How you could get ESSX service provisioned via the grandfathered Florida tariff; and,
- (4) The actions you would take in order for us to work with you in getting your service via the grandfathered tariff.

It was agreed that you would send to Rich Dender a letter stating that you had been working with BellSouth for several months, and only in the past day were you given the information needed to determine which cities you would like to subscribe to ESSX service and that the tariff was changing on May 30. We agreed to utilize the letter to show the ESSX group your commitment to order these systems once you had the information you needed.

If we can be of additional service to you, please call us at 205-977-8955.

Sincerely,



Wade Johnson
Regional Account Executive

Bellsouth Access Customer Sales
South E4E1
3535 Colonnade Parkway
Birmingham, Alabama 35243

Charlotte R. Webb
Systems Designer
(205) 977-8865
(205) 977-0037 FAX

May 31, 1996

Mr. Kip Ripper
President
The Telephone Company of Central Florida, Incorporated
3551 West Lake Mary Boulevard
Suite 210
Lake Mary, Florida 32746

Dear Kip:

As per our conversation of Thursday, May 30, 1996, I am enclosing a rate itemization of for the 150 line Digital ESSX in Orlando, Florida. Also, you will find a drawing depicting my vision of your ESSX service.

In order to ensure the I completely understand how you want your ESSX system to be provisioned via the BELLSouth DMS-100 central office in Orlando, Florida, I am restating how the ESSX service will be configured:

Network Access Registers:	20 Combination
Main Stations:	201
Features:	
Call Forwarding - Don't Answer	
Call Forwarding - Busy Line	
Call Forwarding - Variable	
Call Hold	
Call Pickup	
Three-way Conference, Consultation Hold, Call Transfer	
DECAS (Customer Control of Features)	
Assume Dial "9"	
Automatic Route Selection	
Long Distance:	DS-1 to WiTel

The following requirements are the ones outlined by you for this service:

- Clients to whom you "sell" service will need to keep their existing telephone numbers.
 - No intercom calls will be allowed.
 - All long distance calls will be carried via a DS-1 to the WiTel POP with overflow capability to the Preferred Interexchange Carrier (PIC) on each ESSX main station.
 - The PIC code on each ESSX main station will be WiTel.
- The features on all ESSX main station lines will be activated/deactivated/changed by you.

Please review the attached rate itemization and drawing. If you have any questions or need additional information, you can contact me at 205-977-8955.

Sincerely,

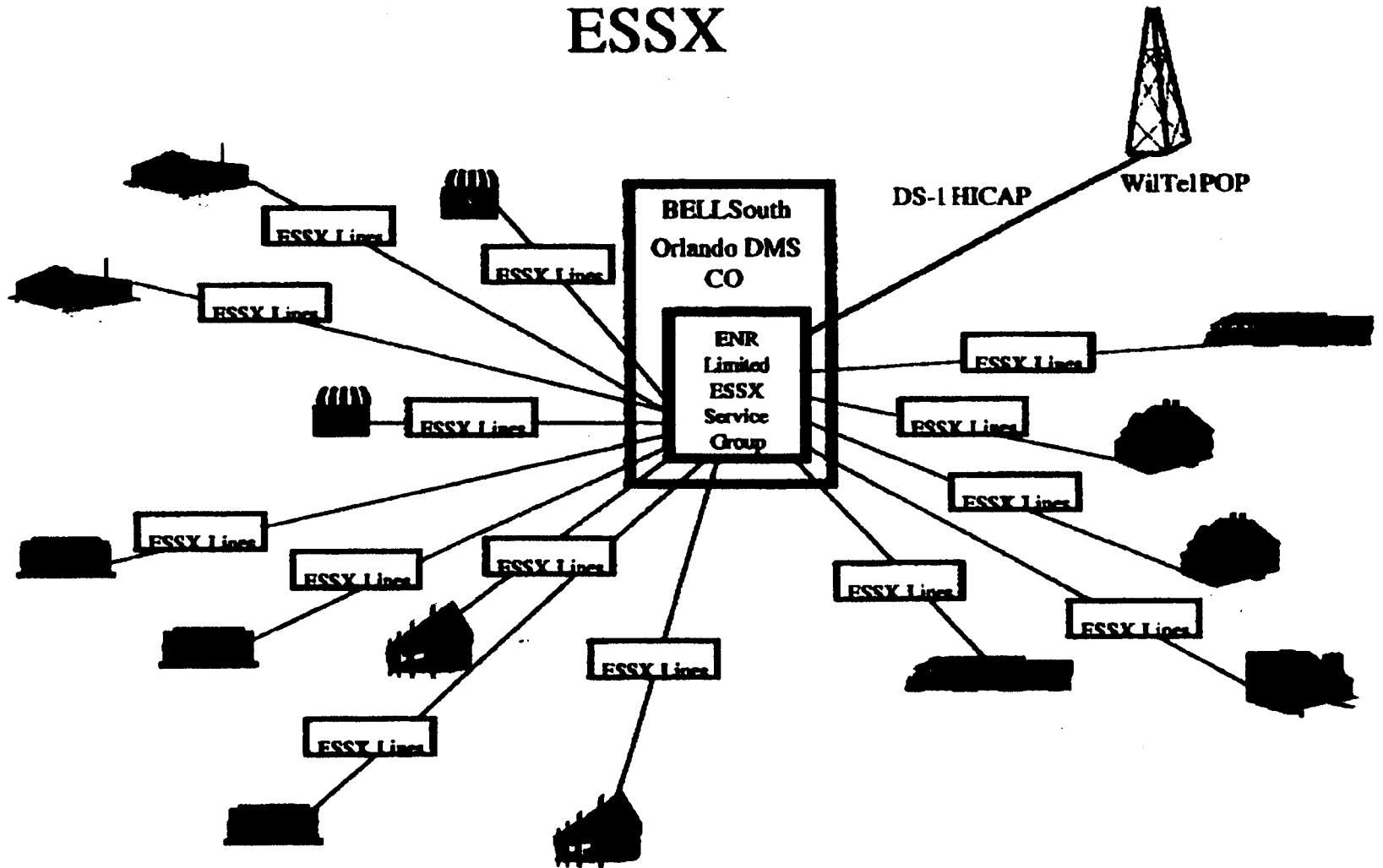


Charlotte R. Webb
Systems Designer

copy: Wade Johnson

Proposed Situation

Reseller Provides Service Via ESSX



*Illustrative Purposes
Only*

ENR Limited, INC.				
The Telephone Company of Central Florida				
Orlando, Florida				
DMS ESSX Rates				
			Non	73
Qty.	USOC	Item Description	Recurring	Months
1	ESS	Service Establishment Charge for Digital ESSX System	\$ 1,500.00	\$ -
1	EQE	Measured Rate Network Access Register, Combination, Initial		\$ 7.21
19	EQG	Measure Rate Network Access Register, Combination, Additional		\$ 136.99
20	LNG	Network Access Limiter, per NAR		\$ -
20	AHB	Surcharge for Hearing/Speech Impaired		\$ 2.00
20	9ZR	FCC End User Line Access Charge		\$ 120.00
1	PSZ	Digital Facility Group		\$ -
1	EES	DS-1 Termination, Digital P/DS1 Circuit Termination	\$ 78.00	\$ 510.00
24	ECA	DS-1 Termination, Digital P/DS0 Channel Activated	\$ 864.00	\$ -
201	EXMWX	Digital ESSX Main Stations, up to 2.5 miles		\$ 984.90
201	NRXSX	Measured Rate Intercom Charge, per Digital Main Station		\$ 2,030.10
1	CPVBL	DECAS, per System	\$ 1,100.00	\$ 7.25
201	CPVZA	DECAS, per Digital Main Station		\$ 40.20
41	E6GPG	Call Forwarding - Busy Line, per group of 5 Digital Main Stations	\$ 123.00	\$ 14.35
41	E9GPG	Call Forwarding - Don't Answer, per group of 5 Digital Main Station	\$ 123.00	\$ 16.40
41	EATPG	Call Forwarding - Variable, per group of 5 Digital Main Station	\$ 123.00	\$ 12.30
41	EABPG	Call Hold, per group of 5 Digital Main Stations	\$ 209.10	\$ 10.25
50	E3PPP	Call Pickup Group, per Group		\$ -
41	E3PPG	Call Pickup, per group of 5 Digital Main Stations	\$ 123.00	\$ 8.20

ENR Limited, INC.				
The Telephone Company of Central Florida				
Orlando, Florida				
DMS ESSX Rates				
Qty.	USOC	Item Description	Non Recurring	73 Months
41	E9APG	Threeway Calling, Consultation Hold, Call Transfer, per group of 5 Digital Main Stations	\$ 123.00	\$ 209.10
1	ABB	Automatic Route Selection - Basic Common Equipment, per System	\$ 215.00	\$ 16.00
2	ARK	ARS Route Selection Pattern, per Pattern	\$ 176.00	\$ 1.40
2	AS5	Trunk Group Terminated in ARS, per Trunk Group	\$ 52.00	\$ 4.10
2	ABM	Six (6) Digit Screening, per Six (6) Digit List	\$ 240.00	\$ -
1	A9DPS	Assumed Dial "9", per System	\$ 75.00	\$ -
201	A9D	Assumed Dial "9", per Digital Main Station	\$ 2,462.25	\$ 100.50
1		Line Connection Charge, First Line	\$ 56.00	
200		Line Connection Charge, Each Additional Line	\$ 2,400.00	
		TOTAL	\$ 10,042.35	\$ 4,304.25



TELEPHONE COMPANY OF CENTRAL FLORIDA, INC.

Sent via Fax
September 4, 1996

Mark L. Fiedler
President
BellSouth Carrier Services
675 W. Peachtree St.
Room 4511
Atlanta, GA 03075

Dear Mark:

I appreciated the candid discussion we had yesterday and feel that we can work together to provide our customers with solid products and services. I would be more than happy to help your staff understand the needs of a typical reseller and the needs of this new business. I can also give you and your people insight into how the other RBOC's and LEC's are handling the resale world.

I also feel it is prudent for me to document what has been happening to TCCF in the last month and request your assistance in resolving the problems we have been having. I might also suggest that BellSouth assign to TCCF a full time service manager to support the daily service needs of my business (specifically in light of my special ESSX service requirements). I also want to stop any new ESSX installations from occurring until we can coordinate the cutovers.

The following customers have been disconnected by BellSouth on various occasions in the last month:

1. Citrus Bank, two locations for over four hours each.
2. Arnold, Mathery, and Eagan, for two days.
3. All Cellular, for two hours.
4. Exotica florist, voice mail for three days.
5. Wanda Classe Mktg., for four days (407-293-9697, Wanda Classe)
6. Pete Bertini, for five days. (407-290-3248, Pete Bertini)
7. Ruth Keirn, for five days. (407-293-6330, Ruth Kiern)
8. Stine Industries, for four days. (407-290-8329, Jon Stine)
9. All Media Group Inc., for four days. (407-294-9900, Diane)
10. Specialty Roofing and Waterproofing Co. Inc., for five days. (407-295-7868 Mark Schmidter)

The last five customers listed are requesting an explanation for their removal from service. TCCF will loose these customers unless BellSouth confirms that it was a BellSouth error that disconnected their service. TCCF did not disconnect them and BellSouth needs to confirm this. Honestly, anything less will cause TCCF to loose the customers. Contact names and numbers are provided with the hope that someone in your organization can call them to reassure them that I, Kip Ripper, did not turn off their services like the BellSouth repair and service center representatives are telling them has occurred.

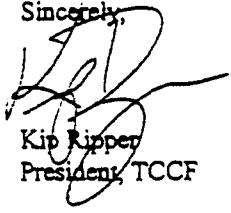
That brings me to the next issue which is why are your repair and service centers telling our customers that TCCF and Kip Ripper by name have disconnected them and that BellSouth no longer will be providing service to them. When the customer then says that they are still with BellSouth through TCCF they are told that it is not true and that BellSouth has no record of them in their accounts anymore.

3551 W. LAKE MARY BOULEVARD, SUITE 210 • LAKE MARY, Florida 32746
PHONE (407) 328-5002 • FAX (407) 321-1454

I do need your immediate assistance to resolve these issues. I suggest that I come to Atlanta to sit down with your technical services support staff to discuss some ways to better coordinate our efforts. I also need to be assured that your local business office and repair personnel are better informed and do not mislead my customers into thinking I've perpetrated a fraud on them by holding myself out as a reseller of BellSouth services. You local Florida personnel are doing that. They keep telling my/our customers that they have been disconnected from BellSouth. The reality is that your personnel do not know the difference between resale and facilities based competitors. Please, can you fix this now before you drive me out of business? Honestly, the above listed issues are just killing my local reputation. I have invested a great deal of time and money in this venture and if we can't work through these issues as partners it will damage my business beyond repair

The next few days are very important to TCCF's ability to survive and maintain a positive reputation. My sales agents are also being affected by these events. They are starting to doubt my credibility. How do I sell without them. The customers listed above have been affected by BellSouth due to the recent outages that BellSouth created. Where do we go from here? How does BellSouth make restitution to these people and to TCCF if I loose them? Please get back to me at your earliest convenience.

Sincerely,



Kip Ripper
President, TCCF

BellSouth Telecommunications, Inc. 404 529-5600
Suite 4511 Fax 404 521-2311
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

Mark L. Feidler
President - InterConnection Services

September 9, 1996

Mr. Elder Ripper
President
Telephone Company of Central Florida, Inc.
3551 W. Lake Mary Blvd.
Suite 210
Lake Mary, FL 32746

Dear Kip:

I appreciate your September 4 letter following up on our conversation of the other evening. As we discussed, resale and unbundling to facilitate local competition is essentially an entirely new mode of operation for BellSouth, and one which presents a myriad of start-up challenges. I appreciate your willingness as a customer to help us understand the problems you and your customers are experiencing, and in working with us to resolve these problems as quickly as possible. I also appreciate the professional approach that you have evidenced.

I have tried to address below some of the items raised in your letter. I have asked other people in my organization to address the remaining items, and to communicate back to you directly the steps we are taking to address them. I've also scheduled a full-day meeting on Tuesday, 9/10, with my staff to review precisely where we are in the resale and unbundling operations area, and the immediate and longer term steps that we are taking to minimize the number of problems as we enter this new form of business. I plan on discussing the particulars raised in your letter at that time. Some specific responses, however, are set out below:

1. I understand that Ann Andrews and a number of her direct reports are scheduled to meet with you the morning of Friday, 9/13, to hear first hand your suggestions as to how we might improve operations.

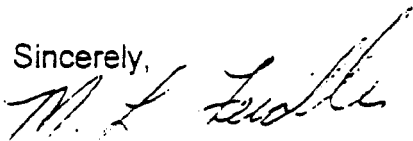
Mr. Elder Ripper
September 9, 1996
Page 2

2. We are in the process of transferring some additional personnel in the LCSC and into the account team organization which have extensive ESSX experience in order to assist TCCF with daily service needs.
3. We will stop any new ESSX installations until we are both satisfied that we have coordinated the cut-overs.
4. Based on a previous conversation between yourself and Ann Andrews, a member of the management team of the Local Carrier Service Center will contact the five customers you mentioned in your letter explaining to them that their service interruption was a result of BellSouth errors and not due to actions of TCCF.
5. We are reviewing our training with the repair and service center representatives to ensure that they appropriately communicate with customers the relationship of your resold customers to BellSouth. I am sure that this will be discussed in your meeting with Ann this coming Friday. I'm also sure there will continue to be a good bit of confusion on the part of customers as to who their service provider is in the resold environment, but I would hope that suggested improvements to this process will be one outcome of your meeting with Ann.

I will give you a call following Tuesday's meeting to give you the benefit of any further information that I become aware of at that time and hopefully to find a time when we can meet face to face. As I mentioned to you in our conversation the other evening, it is BellSouth's intention to bring to the resale and unbundled business environment the same level of professionalism and service that we exhibit in the other parts of our operation. We are devoting substantial resources and efforts to make that happen. Notwithstanding these efforts, however, as in any start-up operation, we are experiencing some problems as we struggle up the learning curve. Unfortunately, given the fact that you are one of the earliest entrants into this business, I'm afraid that you are seeing more than anyone else first hand our struggles to implement this new business. We are committed to making it better. I appreciate your help in that regard, and look forward to a valuable and long-term relationship.

I also look forward to speaking with you this week. If you need to reach me in the interim, please don't hesitate to call.

Sincerely,





TELEPHONE COMPANY OF CENTRAL FLORIDA, INC.

Sent Via Fax
September 20, 1996

Mark Feidler
President-InterConnection Services
BellSouth Telecommunications, Inc.
Suite 4511
675 West Peachtree Street, N.E.
Atlanta, GA 30375

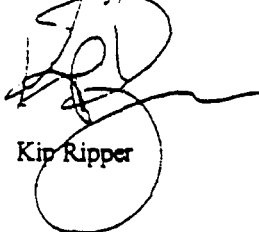
Dear Mark:

I need your assistance in a matter that is critical to the success of the Telephone Company of Central Florida. As you know on the weekend of August 30, 1996 several customers were cut out of service by BellSouth. Consequently TCCF has lost their business and revenue. Furthermore one of these customers has stopped payment on their first payment to TCCF, see the attached copy of his check. This customer owes TCCF about \$1,000.00 for services rendered to date. Paragraph III, H. of our contract indicates that we will work together to collect these funds.

Let me state that this customer, Specialty Insulation and Waterproofing, would have generated revenue of at least \$6000.00 annually. TCCF has lost this revenue. The customer has also stated that due to the out of service time that occurred they will not be willing to pay TCCF. Please remember that they were out of service for almost four days. What can you do in this situation to help TCCF to recover its loses? I would suggest that BellSouth offer to give TCCF a credit for an amount to be determined by you or you staff. Lastly, TCCF is currently working on a list of customers that have switched back to you because of similar problems and the amount of lost TCCF billing and annual revenue.

Please let me know how you would like to deal with this. Barbara Jean Warren has indicated that she would be able to give us credits on our account for lost billed revenue. I look forward to a favorable outcome for all of us.

Sincerely,



Kip Ripper

3551 W. LAKE MARY BOULEVARD, SUITE 210 • LAKE MARY, FLORIDA 32746
PHONE (407) 328-5002 • FAX (407) 321-1454

SPECIALTY INSULATION AND WATERPROOFING CO. INC.
3609 SHADER RD.
ORLANDO, FL 32808
(407) 295-7868 FAX (407) 293-5302

SUN BANK, N.A.
ORLANDO, FL 32807
63-215/631
0528138

00012597

12597

**** FIVE HUNDRED ONE & 36/100 CENTS

STOP PAYMENT
STOP PAYMENT

PAY TO THE ORDER OF: Telephone Co. of Cent Fl.
Department #1126
Tulsa, OK.
74182

AMOUNT
05/05/96 *****\$501.36

Mark C. [Signature]

040124185 5304 5502 05/05/96
⑈012597⑈ ⑆ 331021521 6759251537 ⑈ ⑆ ⑈0000050136⑈

SECURITY FEATURES INCLUDED. DETAILS ON BACK. B

BellSouth Telecommunications, Inc. 404 529-5600
Suite 4511 Fax 404 521-2311
675 West Peachtree Street N.E.
Atlanta, Georgia 30375

Mark L. Feidler
President - InterConnection Services

September 23, 1996

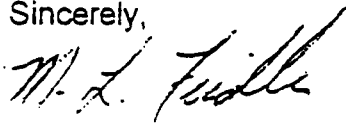
Mr. Elder "Kip" Ripper
President
Telephone Company of Central Florida, Inc.
3551 W. Lake Mary Blvd.
Suite 210
Lake Mary, FL 32746

Dear Kip:

I received late Friday afternoon your fax regarding the situation with Specialty Insulation and Waterproofing. As you had previously requested, I had a representative in my carrier operations group contact Specialty Insulation and Waterproofing to discuss with them directly the cause of their recent service interruption. That part of my organization is managed by Ann Andrews, who you met with in Florida last Friday. I have forwarded your letter to Ann to handle in light of the fact that she has operational responsibility for matters of this sort, and a much more detailed understanding of the particulars of this situation. Ann or someone in her organization will be contacting you promptly to discuss the particulars surrounding this situation, and any suggestions as to how to move ahead.

I will continue to follow the situation to make sure that it receives an appropriate level of attention.

Sincerely,



cc: Ann Andrews
Joe Baker
Fred Monacelli

BELLSOUTH MEETING

DATE: September 12, 1996

Time: 9:00 AM - 12:00 Noon

PURPOSE: To discuss major issues and solutions to create an OLEC environment which benefit all parties of the partnership, including BellSouth, TCCF and the End-user customer.

AGENDA ITEMS

Major Issues

1. ESSX Service (Turning Up Circuits and Moving Existing Accounts To ESSX)
2. Service Outages
3. Repair Service (Interfacing with End-User Customer and Re-routing to TCCF)
4. Directory and Additional Listings dropping
5. Yellow Page Issues
6. PIC Changes (Some are not completed)
7. Cover Form for Freeze Pic
8. Billing with ALEC Discounts
9. BellSouth Promotions and Discounts (Residential Service/Feature Offering)
10. Pay Phone Rates and Discounts (For Existing and New Service)
11. Non-recurring Service Order Charges to Switch Service to TCCF

Other Issues

1. Ameritech Services Information
2. Service Orders
 - a. Providing weekly, completed orders, dates orders are processed, status of PIC, any rejections, and etc., rather than faxing confirmations on daily basis.
 - b. "Switch as is" versus "Switch with changes"
 - c. Service charges for the various "Change" orders, business or residence.

- d. Accounts with Omitted Phone Numbers on TCCF service request should be provided TCCF once identified by BellSouth.

3. Repair Service

- a. Procedure that ensures end-user customer is not confused by repair reps about the status of their service, and a better and more helpful method to route customers to TCCF to resolve their service problems.

4. OLEC Discounts on service and service features as outlined in the guidelines recently established by the FCC.



TELEPHONE COMPANY of CENTRAL Florida, Inc.

Sent via Fax
October 1, 1996

Wade Johnson
BellSouth
South E4E1
3535 Colonnade Parkway
Birmingham, Alabama 35243

Dear Wade:

I need to confirm in writing several concerns and issues that have been discussed with various BellSouth individuals during the last month. I first want to reaffirm that you are my primary BellSouth contact. It occurs to me that I have taken the opportunity to meet with several of you leaders and peers. But, to make this arrangement work I do need to coordinate my efforts through no more than two people. Yourself from an overall account management position and a customer service manager (TBD). The later person to handle the day to day issues that TCCF can not handle with the normal BellSouth infrastructure.

Listed below are the current problem areas that TCCF have encountered in the last four months of operation. Clearly we need to confirm this list and then agree on how we can help each other to improve our performance in these areas.

1. TCCF needs a monthly billing on tape of all our monthly fixed and recurring charges. Without this we can not bill our customers for intralata toll, directory assistance, and other similar charges. We were promised monthly tapes from day one. Is BellSouth going to forgive these charges until we can get this billing on a medium that TCCF can rebill from. TCCF is losing revenue daily.
2. Our current billing has numerous errors to the point that we are concerned about its total integrity.
3. Our billing does not include discounts.
4. We have been trying to establish ESSX service for four months. BellSouth does not have a resource to support my efforts. I have lost over 400 customers in South Florida due to this problem. How do we fix this problem and when do we fix this problem. BellSouth is severely injuring my business. Due to delays in cutovers I'm currently paying Wiltel for local backhaul circuits to eight sites that BellSouth accepted the local loop, but never cut the ESSX system into service. Additionally the ESSX systems do not have assume dial "9" service as requested in our agreements. I definitely need assume dial "9". I have now hired a person to coordinate all the ESSX cuts on my side. I'm ready to go now. Fred promised a support person by October 1st. Well its time. I'm losing time and money.
5. TCCF needs product guides and training for BellSouth's retail service offerings and training for our CSR's so that we can be accurate in reselling your services. We've discussed this many times and had several promises of action. I do not have any documentation nor have I heard of any training.
6. What do we do when TCCF loses a customer because BellSouth cuts them out of service. TCCF loses revenue to date and the potential revenue for the foreseeable future. See our contract paragraph III. H.,

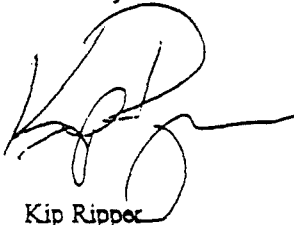
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PHONE (407) 328-5002 • FAX (407) 321-1454

Both parties agreed to provide support regarding moving customers with outstanding balances. Actually neither party should move customers with outstanding balances, but this is not reasonable so we must protect each others positions. I requested assistance on this matter September 20th and have not heard anything to date.

7. What is the escalation procedure for out of service customers? We are constantly caught between the repair and service centers. If an order is not closed repair will not help us.
8. Who handles pic problems? We have requested that all of our lines be pic'd to Wiltel and frozen. TCCF does not intend to pay for LEC billed calls because the pic was changed or missed during the order process. We have also have had several customers with no long distance after cutover. No one has ever told us why.
9. Will our out of service problems at cutover be resolved? When will BellSouth be able to assure us that this will not occur on a regular basis?

Wade, I spent endless hours talking to all of the appropriate BellSouth executives now its time for action. I can't do business with promises. We do have a contract and I need your help as my partner to begin holding up your end of the bargain. TCCF has been patient for four months, I do believe that I deserve a written and positive response to my comments no later than the close of business October 4, 1996.

Sincerely:



Kip Ripper

TELEPHONE COMPANY OF CENTRAL FLORIDA, INC.



Sent via Fedex
October 7, 1996

Barbara Jean Warren
BellSouth
LCSC
D 20
5147 Peachtree Industrial Blvd.
Chamblee GA. 30347

Dear Barbara Jean:

Enclosed you will find a payment of \$10,000.00 for the attached invoices. I believe it is prudent for TCCF to put BellSouth on notice that this billing is unacceptable in its current form. TCCF is paying the \$10,000.00 in good faith to maintain its good credit rating and payment history, but frankly this billing is less than creditable. TCCF has had the following billing issues and BellSouth needs to respond to them in writing to confirm that they recognize that they exist:

1. The billing does not confirm discounts nor take them into consideration.
2. BellSouth CSR's sent at the time of cutover do not always agree with the billed amounts. What is accurate? TCCF uses the original CSR to issue billing records to its customers. We need accurate and consistent records. The LCSC needs to follow up with Andrea Welch on this issue.
3. TCCF is being billed by BellSouth for ESSX service its not using and can't use at this time. Account 407-318-8000 was billed and should be credited until we can utilize ESSX. Currently the service is installed without assume dial 9. This makes it useless to my clients. Please credit the account until this problem is fixed.
4. Credits have been issued on accounts that were lost due to BellSouth cutover problems. TCCF has not seen written confirmation of these credits and their amount. We need to see a credit memo. Estimated annual lost revenue to date \$12,000.00.
5. We can't bill local usage revenue without tapes. They have been promised from day one and we have now lost four months of revenue. TCCF will not pay for services we can't rebill because BellSouth will not send us a tape. Estimated lost revenue \$5,200.00 to date.
6. Who do we escalate billing issues to in this situation? To you ?

These issues are serious enough that my staff has spent at least 40 hours a week since late July trying to work with the billing issues. This is not productive for TCCF or BellSouth so it must stop. TCCF has probably lost \$5,000.00 in lost work time trying to deal with these issues. We therefore must request a written proposal that will deal with these issues as soon as possible. We can't continue to lose revenue and personnel time to these easily resolvable problems. I expect a call in the next few days to discuss how we move forward.

Sincerely,


Kip Ripper

3551 W. LAKE MARY BOULEVARD, SUITE 210 • LAKE MARY, FLORIDA 32746
PHONE (407) 328-5002 • FAX (407) 321-1454

BELLSOUTH



To: Kip Ripper
Company:
At: 914073211454

From: Wade Johnson
Company: BellSouth
Voice: (205) 977-8955

Date: 10/16/96
Time: 8:01AM
Pages Including Cover: 1

MEMO

Notes: I lied. Didn't mean too.

My schedule of events for the 4th Quarter of 96 shows 10/16, start date of new account team members. Turns out that only Bill Morrison is coming on today. The other two, the ones that you and I are concerned with, are not coming in until the first of November. I don't know why they couldn't get away earlier. I just learned about the Nov. 1 date yesterday in our Atlanta meeting.

I think we should get with the LCSC and try to turn up a few of those ESSXs. What is your thoughts?

By-the-way, I noticed on your first issue (your letter to me) that you said you had been promised tape billing from day one. Who promised you? We can provide that service, but we may charge for it. No determination has been made yet, and I want to have my gun loaded.

Wade

BellSouth Access Customer Sales
South E4E1
3535 Colonnade Parkway
Birmingham, Alabama 35243

Wade Johnson
Regional Account Manager
(205) 977-8955
(205) 977-0037 FAX

October 22, 1996

Elder N. Ripper
Telephone Company of Central Florida, Inc.
3551 W. Lake Mary Boulevard
Suite 210
Lake Mary, Florida 32746

Dear Kip:

In response to your letter, via FAX, sent October 1, 1996:

I am sorry it has taken so long to respond in writing, but I have tried to keep you up on our progress in our conversations. We still have not worked out all the issues you mention, but are continually working to improve our service to our resell customers.

On issue number one, Paula Murphy, the LCSC supervisor, informs me that you will be getting your monthly bill on paper and mag tape for six months. After that, you must make a choice of which media, or pay \$77 monthly for both. If you choose one or the other, the bill is still free.

On issue two, any problems with the bill can be handled by the LCSC. Call service rep Glenda Foster at 1 800 872-3116, and press 2 for the billing group.

On issue three, effective October 1, 1996, the OLEC discounts will be automatically discounted on the bills. The discount will appear as a reduction of the monthly services. Per Mr. Craig Steele, all previous bills have been verified and the discounts were applied.

On issue five, BellSouth is discussing several training methods. We have scheduled a December 10th and 11th training session at the Atlanta Executive Park Learning Center for OLECs, and will be sending additional information at a later date.

On issue seven, escalation procedures, your company has available to you the resources of the Residential Repair Center (611) for 1FR and 1FB customers. Repair intervals are dictated by the area reported in and by the load being experienced by network in this area. On average, you should expect an 18-24 hour turnaround on trouble reports, but it could be shorter or longer depending on extenuating circumstances.

You may report small business troubles to the Business Repair Center (780-2222). Again, the repair appointments and intervals are based on the load experienced by Network in the area that you are calling about. All customers reporting like classes of service are treated equally by LMOS as they are in the RRC. Intervals can be longer or shorter depending on load and weather conditions. Escalation procedures are handled within each center and the receiving agent is familiar with the policies and procedures for the troubles being reported.

Just as a reminder, the repair of any resold service, whether it is 1FR, 1FB, ISDN, DID, ESSX, or IPP, is handled out of the retail outlet that would normally serve this customer. No resold service is handled out of the ACAC.

On issue eight, the Equal Access Service Center would handle unauthorized PIC changes on your customers. The LCSC would handle any other PIC problems.

On issue nine, I have discussed your problems with everyone from Ann Andrews down. We will be continually addressing this issue, but will need time to make sure that these cutovers go smoothly. Please let me know specifics when you incur problems.

The other issues are being addressed, but so far, I do not have definitive answers. I will forward them to you when I get them. Please let me know when you experience problems. BellSouth's goal is to provide excellent service to you and all of our customers.

Sincerely,

A handwritten signature in cursive script, appearing to read "Wade".



Telephone Company of Central Florida, Inc.

Sent via Fax
January 13, 1997

Joseph M. Baker
Vice President-Sales
Interconnection Services
BellSouth Telecommunications, Inc.
Suite 4423
675 West Peachtree Street, N.E.
Atlanta, GA 30375

Dear Joe:

I want to thank you for coming to Lake Mary to visit our facility and meet the TCCF employees. We do believe in our relationship and think of BellSouth as our partner in the resale business. I want to confirm several issues that we discussed and request that your staff establish in writing solutions to resolve these issues. Further, I believe that specific time frames need to be set to reach these solutions so we can resolve these issues in a timely fashion. We also need to establish policies and procedures for many of our interfaces and functions. TCCF would like to actively participate in an industry group to work with BellSouth on these kinds of determinations.

First, I want to make a list of our current issues so that we can start a more formal dialogue that will resolve these problems one at a time. We both can then confirm that they have been resolved and how. We should meet by conference call no less than once a week until we can agree that enough of the issues are resolved so that we both can function in a businesslike basis that does not affect our customers. I would suggest that Andrea Welch of my office and Ed English of your office conduct these meetings. The following list of issues needs to be resolved quickly:

1. Our billing is a disaster and needs to be cleaned up. We need a single point of contact to resolve these issues. See the second part of the letter for details.
2. We need to do our orders in a fashion that will not affect our customers. We estimate that about 20 to 25 percent of our customers have one of the following problems at the time they are switched:
 - Out of service
 - Lose directory assistance
 - Lose advertising
 - Lose pins for features
 - Lines are moved to different physical appearances
 - Misbilled
 - Not moved at all
 - Partially moved
 - Features and services changed
3. We need to confirm our account support team and have a problem escalation procedure for order entry problems.

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PHONE (407) 328-5002 • FAX (407) 321-1454

4. Your idea of a resale/wholesale repair center is excellent. What do we need to do to establish this center.
5. We need an interface into your billing support group so our billing company can get support for its questions on your billing tapes.
6. We need an order confirmation system ASAP. We are losing orders.
7. We need for your commercial group to stop moving our customers back until they pay their bills. We have lost tens of thousands of dollars of revenue due to this problem. The list of five customers we gave you is only the tip of the iceberg. You can not give these customers several days to make other arrangements to pay these bills. We have already given them the appropriate time frames to make arrangements to pay and now you are giving them more time to figure out ways to avoid the collection process. We want them turned off now. I also want to state for the record that our contract specifically calls for you not to move them if they have outstanding balances, plus we also have signed transfer of authority agreements on over 90% of our customers giving us legal ownership of the numbers. We do not intend to hold hostage these numbers but will immediately release them, upon receipt of payment in full, back to BellSouth. Lastly, for the most part, no formal notification of the loss of TCCF customers is occurring.
8. BellSouth has not been effective in getting our orders processed for over two months. The order intervals have been as long as 60 days to never (meaning they were lost). We know you moved your center, but can you assure us that this is over?
9. We need a single point of contact to process our centrex orders. Please confirm this process with Ken Koller of my staff.
10. We need access to your Internet products and services. Please help us with this request.
11. TCCF believes that we can be more effective in our roll as a reseller if BellSouth will train us effectively on available products and services. We also need access to qualified product managers.
12. TCCF needs to be trained on your order entry processes and procedures. We have a guide book and have been doing our best but your initial support staff seemed to know much less than we did. This situation has obviously affected our customers' service.
13. Bottom line is that BellSouth needs a certification process and a start- up kit for resellers so it can keep itself out of harms way.

Joe, we discussed many solutions to these issues and I acknowledge that we had a positive meeting. I have reiterated my concerns because I want BellSouth to confirm in writing exactly what we need to do to resolve these issues and within what time frame so that I can move on with my business. If you review the many letters TCCF sent to BellSouth in the last eight months, I have been bringing up these same issues time and time again without a real response or resolution from your organization. So bear with me if I seem redundant. I expect to see a change and I am pleased to help in any way I can.

Now, lets discuss in specifics the billing issue and the loss of business that TCCF has experienced due to BellSouth's inability to support our needs to date. We have to get this corrected now before it becomes too large to resolve. A portion of this problem is easily resolved and I will address this first. The following list of items should be credited to us ASAP:

1. All ESSX billing should be credited with the exception of the cutovers in December which were coordinated by Ken Koller. We have been billed for all the ESSX common block services put in place by Miss Webb since August and have not been able to utilize them.
2. On the early bills, no discounting occurred and no credits have ever been issued. We need an accurate method to determine if we are getting consistent discounts and an explanation of how it occurs.
3. We should not be billed for any LEC billed charges until we agree to a LEC billing arrangement that compensates us for the collection process. This would include dial around, intralata toll, 411, advertising and other similar services that you currently bill for other vendors. Now, if you are going to discount them like the rest of your residential and business services then we have no problem. Except, that we did not begin to receive billing tapes until last month and not until two weeks ago did we receive your billing plan specifications. I suggest that you make sure that any new resellers receive an up-front package that includes these elements. I can not bill it if I do not get it on tape and receive

the plan specifications. BellSouth needs to get its act together. You folks are in the resale business. I suggest that you credit all billing for these services through December 31, 1996 for TCCF due to BellSouth's lack of response to TCCF's requests. You do have an obligation to support the reseller.

4. We have been billed for multiple service orders on many conversions. Most of these service order changes were because your procedures were constantly changing due to a lack of experience in this business. Your people were also inexperienced and seem to have charged us for all the change orders regardless of who changed the order or why. Frankly, as a show of good will on the part of BellSouth I am requesting that all service order charges be forgiven for this entire period. The time it will take us to resolve which is which and who did what to who would cost us both more than the amount involved. Obviously, this is not a small amount of money, but if you look at the amount of business that TCCF has lost and the amount of time we have lost because of all the problems we have had, it is a small price to pay.
5. TCCF and BellSouth both need to review the current monthly recurring billing together and determine if it is accurate. I believe the only way we can do this is to have your billing person come to Lake Mary and review this issue with Andrea Welch and establish a method to check and review the situation on a regular basis.

The last couple of issues are more difficult to deal with. Here they are:

1. TCCF's business plan was based on doing business primarily through its ESSX switches. When BellSouth could not effectively turn them up last year, TCCF was faced with going out of business or just reselling until we could utilize the ESSX services. Our profit margins and product pricing in what we call our metro CO's is obviously different than normal resale of BellSouth services. Since BellSouth could not support our ESSX service, TCCF lost revenue due to the following issues. First, our cost of long distance in an ESSX environment is less than \$.05 per minute. In a normal switched services situation, my cost is over \$.10 per minute for customers in the state of Florida. Therefore, BellSouth has cost me \$.05 per minute on all my toll calls from any NNX that is in my ESSX area. This is over 70% of my planned business. In December this will cost TCCF nearly \$20,000.00. My loss year-to-date is over \$100,000.00. Additionally, if you look at the cost of a line appearance in TCCF's ESSX world it is \$17.10 for a line that includes the following features:

- Call Forwarding Busy
- Call Forwarding No Answer
- Call Forwarding Variable
- Consultation Hold
- Call Transfer
- 3Way Call Conferencing
- Call Pickup
- Assume Dial "9"
- Automatic Route Selection
- DECAS

The average cost of a Business line with just two or three of these features is at least \$35.00 retail or \$30.80 wholesale to me at 12 percent off the retail rate. This means in round numbers, TCCF also loses almost \$14.00 per line, per month on a business line in my ESSX CO's. If I was billed for only 1000 line appearances over the course of 1996 in these areas, it has cost me an additional \$14,000.00 for the service. This does not take into account the amount of business I did not pursue due to these drastic differences in cost. Honestly, I am now selling below my cost due to your inability to service my business in ESSX areas to date. If this shocks you, imagine how I feel. Especially since your lack of response as a corporation is the reason that this has occurred. BellSouth's lack of support for my contract is the reason TCCF has lost this money.

2. This brings me to a new topic that will cost TCCF even more money. Since I had to provision these ESSX accounts as regular business lines, I now have to pay again to install them as ESSX lines. This is not my fault and gives even more credence to my request to credit all service order fees to date.

3. TCCF has had to spend countless man months this year dealing with this mess. This time should have been spent doing new business and adding new sales agents. This loss of time was preventable by BellSouth and is a direct result of your actions and lack thereof. If BellSouth had been ready with good quality staff and procedures, TCCF would not have spent at least \$50,000.00 in lost wages dealing with your problems. We continue to do so and hope that our partnership will pay off. Now is the time to show some good will by discussing credits for our many unresolved problems.

This list of issues does not include lost TCCF revenue due to lost TCCF customers because of BellSouth errors. Nor do it include the lost business due to your inability to turn up my ESSX lines. No, I have only listed actual costs that are directly attributable to BellSouth's inability to support this business venture. We may debate on some of them, but I am sure that you owe me a response on each element. Lets discuss this early next week and come up with a good will credit that will not harm either parties business position, but will compensate TCCF fairly for its problems in 1996. I must prudently point out that TCCF is only at 10 percent of its planned 1996 revenue due to these problems and issues. If you were in my position what would you be doing about now.

Sincerely,



Kip Ripper
President

Non-ESSX Comparative Information:

Non ESSX Customer (Orlando - Basic)

Feature	TCCF	Cust
Business Line	\$ 23.80	\$ 28.60
Call Fwd Variable	\$ 5.49	\$ 6.60
Call Fwd Busy	\$ 2.70	\$ 3.25
Three Way Calling	\$ 3.33	\$ 4.00
Call Fwd Don't Answer	\$ 2.70	\$ 3.25
MultiFeature Credit	\$ (2.50)	\$ (3.00)
FCC Charge	\$ 8.17	\$ 8.17
Telecom Relay Svc	\$ 0.12	\$ 0.12
Total	\$ 43.81	\$ 50.99

ESSX COST 19.15

Non ESSX Customer (Orlando - Plus)

Feature	TCCF	Cust
Business Line	\$ 23.80	\$ 28.60
Call Fwd Variable	\$ 5.49	\$ 6.60
Call Fwd Busy	\$ 2.70	\$ 3.25
Three Way Calling	\$ 3.33	\$ 4.00
Call Fwd Don't Answer	\$ 2.70	\$ 3.25
Call Return	\$ 4.16	\$ 5.00
Hunting	\$ 7.70	\$ 9.25
MultiFeature Credit	\$ (4.99)	\$ (6.00)
FCC Charge	\$ 8.17	\$ 8.17
Telecom Relay Svc	\$ 0.12	\$ 0.12
Total	\$ 53.18	\$ 62.24

ESSX COST 19.15



BellSouth Telecommunications, Inc. 305 260-8250
Room 336 Fax 305 262-4978
600 NW 79 Avenue
Miami, Florida 33126

Building Industry Consulting Service

November 11, 1998

Telephone Company of Central Florida
Attention: Mr. Ken Kollar
3599 West Lake Mary Boulevard, Suite E
Lake Mary, Florida 32746

RE: TELEPHONE COMPANY OF CENTRAL FLORIDA
100 N. BISCAYNE BOULEVARD, SUITE 1000, MIAMI, FLORIDA

Dear Sir:

This is to confirm our agreements concerning customer provided support structures required to accommodate BellSouth telephone facilities to provide network services to the demarcation point for the subject project. The attached specification, 350-98-1102, reflects only the requirements of BellSouth. However, there may be other vendor telecommunications requirements such as conduit, sleeves and equipment space that you may need to consider in your plans. You should negotiate any additional requirements with your vendor(s).

If elevator telephone service is required to obtain a Certificate of Occupancy, your construction schedule should allow sufficient time for BellSouth to install the serving terminal. Please call your local telephone company Business Office a minimum of one week in advance of the desired service date.

It is necessary that the agreed upon support structures be in place and the Building Industry Consulting Group in BellSouth be notified at least 60 days prior to your required service date, estimated to be January 29, 1999. The attached specifications reflect our agreements. If changes are required, prior to building completion, please inform us as soon as possible. BellSouth recognizes that design changes are sometimes necessary and we will do our best to accommodate your needs. Please understand, though, that such changes may result in delayed service, and special charges may be applied in accordance with the general provisions of the tariff to recover any excessive costs incurred by BellSouth.

If additional information is required, or if changes occur, please do not hesitate to contact me at 305-260-8241.

Yours truly,


Harold Elosoqui
Building Industry Consultant

HIE/As

Attachment: 350-98-1102

cc: Tom Houser, BellSouth Telecommunications
Teresa Mateo, BellSouth Telecommunications
Jack Jackson, BellSouth Telecommunications
Bob Hilton, BellSouth Telecommunications

CL350-11.02

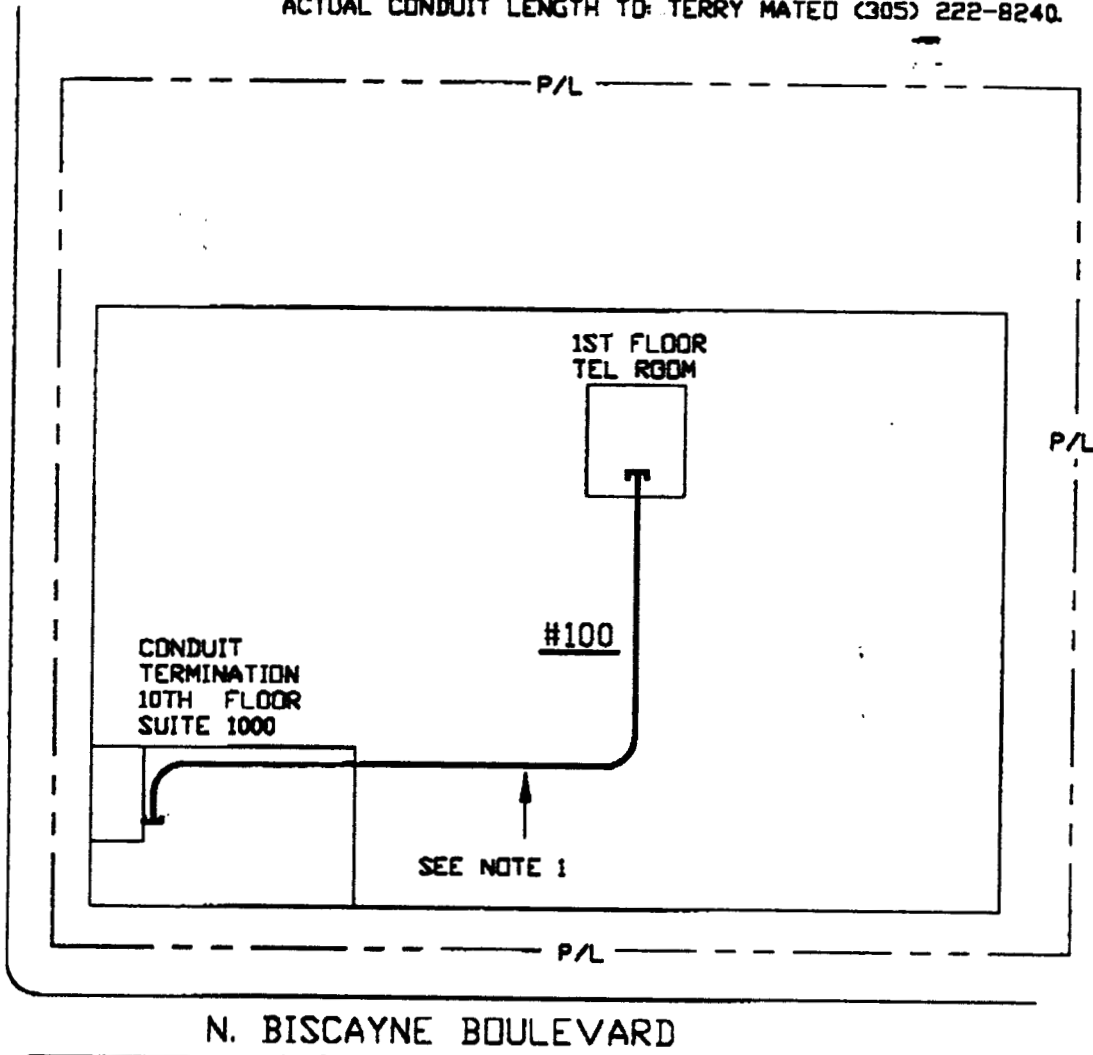
TERRY MATED 222-8240
11/10/98

NOTES:

1. CUSTOMER TO PROVIDE 1-4"
CONDUITS FROM 1ST FLOOR TEL.
ROOM TO 10TH FLOOR (SUITE 1000)
AND TERMINATE AT END OF CUST PROVIDED
FRAME LINE-UP. CONDUITS E/W 2-1" INNERDUCTS
AND PULLSTRINGS

2. CUSTOMER SITE CONTACT: WARREN COWNIE
305-379-7617

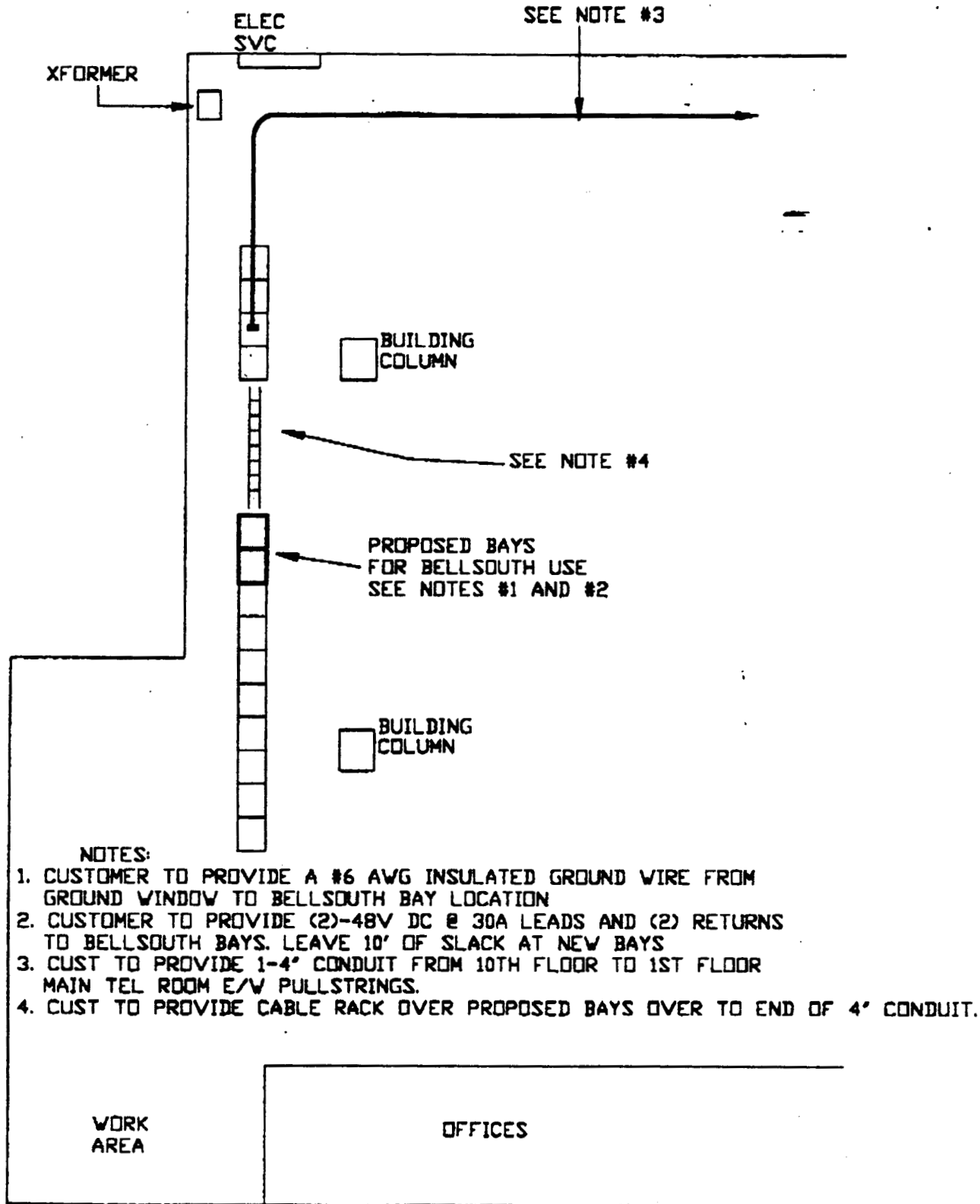
3. MR KEN KOLLER (DIR OF ENG)
1-407-324-1396 TO PROVIDE
ACTUAL CONDUIT LENGTH TO: TERRY MATED (305) 222-8240.



SITE PLAN
N.T.S.

JOB NO. 350-98-1102
DWG. 1 OF 8

FLOOR PLAN DETAIL

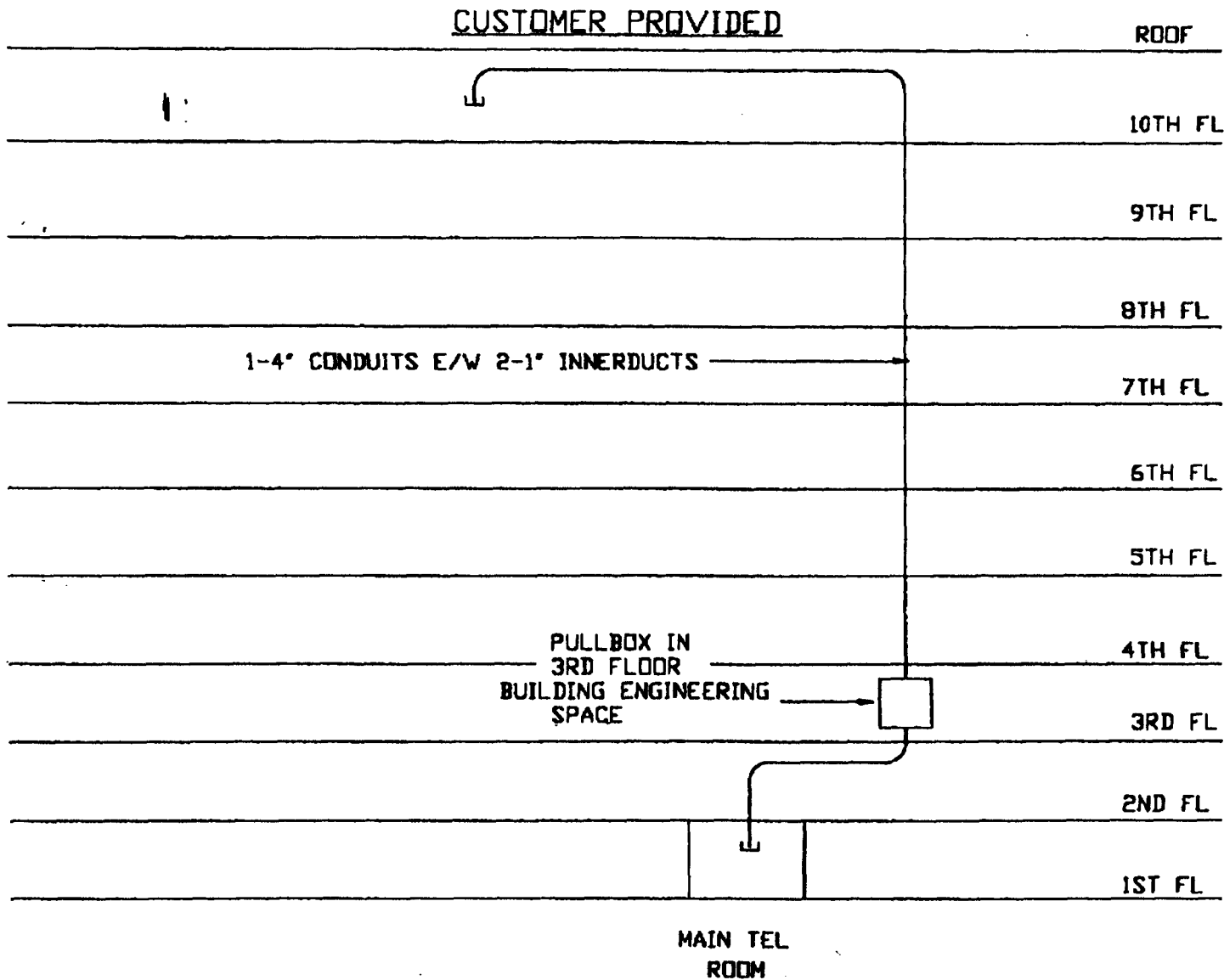


NOTES:

1. CUSTOMER TO PROVIDE A #6 AWG INSULATED GROUND WIRE FROM GROUND WINDOW TO BELLSOUTH BAY LOCATION
2. CUSTOMER TO PROVIDE (2)-48V DC @ 30A LEADS AND (2) RETURNS TO BELLSOUTH BAYS. LEAVE 10' OF SLACK AT NEW BAYS
3. CUST TO PROVIDE 1-4" CONDUIT FROM 10TH FLOOR TO 1ST FLOOR MAIN TEL ROOM E/W PULLSTRINGS.
4. CUST TO PROVIDE CABLE RACK OVER PROPOSED BAYS OVER TO END OF 4" CONDUIT.

JOB NO. 350-98-1102
DWG. 2 OF 8

TELEPHONE RISER DIAGRAM



Page 4 of 9

NOTE:

ALL CONDUITS TO BE EQUIPPED WITH PULLSTRINGS.

JOB NO.350-98-1102
DWG 3 OF 8

JOB NO. 350-98-1102

DWG NO. 4 OF 8

EQUIPMENT ROOM REQUIREMENTS
FOR
CUSTOMER PREMISES
FIBER OPTIC PROVISIONING

FOR

TELEPHONE COMPANY OF CENTRAL FLORIDA
100 N. BISCAYNE BOULEVARD, SUITE 1000
MIAMI, FLORIDA

HAROLD I. ELOSEGUI
BELLSOUTH TELECOMMUNICATIONS, INC.
600 N.W. 79 AVENUE, ROOM 336
MIAMI, FLORIDA 33126
TELEPHONE (305) 260-8241

CUSTOMER REQUIREMENTS

The building owner is responsible for providing the necessary space to house the telephone equipment, cable, associated apparatus, and the required environment, power, and grounding as specified on the following floor plans and notes.

All the support structures shown in these specifications must be ready for final inspection 30 days before service is required.

GENERAL

1. Equipment should not be located in damp basements or areas subject to flooding. To prevent malfunction and/or interference to the equipment it should not be located in the same room as, or one adjacent to:
 - A. Silicone based copying machines.
 - B. Areas that have high concentrations of corrosive gases, metallic contaminants, paper fiber or carbon particles.
 - C. An electromagnetic field greater than 1 volt per meter and/or non-synchronous motors that generate electromechanical noises (i.e. small hand tools, electric drills, etc).
 - D. Where the acoustical noise exceeds what is specified by OSHA (90DB).
2. The equipment room must have no water pipes running through or directly above it, unless drip trays are provided, or the pipe feeds a code required sprinkler in the room.
3. The equipment must be located in an area where there is a minimum unobstructed clearance of 9' above the floor.
4. The equipment area should be as near dust free as possible during and after installation. The floor should be tiled or suitably sealed, level and free from vibration. The wall and ceiling finish must be a dust free surface that can be cleaned and will not flake.
5. The doors within the access route to (and into) the telephone equipment room must be a minimum of 30 in. wide and 6 ft. 8 in. high to allow for equipment placement and removal.
6. The equipment room must have lighting with an associated wall switch, sufficient to produce a uniform light intensity of 30 foot candles taken at floor level. Light fixtures must be hung a minimum of 9 ft. above the floor.
7. The maximum fully equipped bay weight is approximately 450 pounds. The floor loadings should be rated to accommodate this weight. A floor load rating of 50 pounds per square foot will be adequate.
8. Maintain clear access to the equipment area and keep the area clear for installation and maintenance of equipment at all times. No storage is permitted in the room.

TEMPERATURE & HEAT RELEASE

1. It is required to maintain an ambient temperature of between 60 and 90 degrees Fahrenheit, with maximum relative humidity of 95%. Heat release is calculated at 900 BTU per hour from the Telco equipment.

CUSTOMER REQUIREMENTS

ELECTRICAL

1. BellSouth recommends that the power supply be a part of the UPS or Emergency Power System. Without AC power to the equipment all telephone will be lost after 6 to 8 hours. BellSouth also recommends that your tenant be advised of your decision regarding back-up power.
2. The branch circuit wiring and outlets for the equipment bays will be installed by a licensed electrician. The outlets should be duplex and placed at 7 1/2" feet height unless otherwise noted.
3. All electrical facilities must be provided in accordance with the National Electric Code and local requirements.

GROUNDING

1. It is necessary for BellSouth to ground our equipment to the building power Grounding Electrode System (see grounding detail).
2. Any deviation from this grounding method must be approved in advance by BellSouth.

FIRE PROTECTION

1. Fire protection must be provided to comply with local codes in the area where the electronic equipment is located. A gaseous extinguishing system is preferred as first choice in all cases. If sprinklers are used, the temperature setting should be the highest allowed by code.
2. The customer should provide and maintain extinguishers to meet OSHA requirements. One gas and one 2-A rated water extinguisher are recommended for equipment rooms. The extinguishers may be located outside the equipment room but should be no more than 75 feet away. Gas extinguishers may be 10-pound dioxide (5-B:C rated) or Halon 1211 (10-B:C rated).

NOTE: Dry chemical extinguishers must not be used on telephone equipment.

FIRE STOPPING/DROP CEILING

1. BellSouth recommends that conduit be provided for all telephone wiring and the use of the above suspended ceilings be avoided whenever possible. However, when unavoidable, and the space is not used as a return air plenum, the false ceiling area may be used subject to the following consideration.
2. To avoid disruption of other tenants, it is required that the area above the suspended ceiling be used only for telephone service to the same floor/same customer.
3. If the false ceiling space is used for cable distribution, to avoid damage to the ceiling, ceiling tiles should be removed by the building owner or customer. Heavy outside plant type cables should not be placed in suspended ceiling space as exposed cable without supporting conduit and anchor support structure.
4. Building codes and safety regulations place additional restrictions on the use of the space above suspended ceilings. Therefore, please be advised that we will install our cables in the area above the false ceiling in accordance with the above conditions provided it does not violate the National Electric Code, Southern Standard Building Code, National Safety Code, or the Occupational Safety and Health Act.
5. Building codes and safety regulations also place restrictions on sleeves and/or riser space when penetrating fire-rated walls and floors. It is the responsibility of the building owner, his agents, or assignees to fire-stop and to seal all pathways through floors and walls in compliance with applicable building codes, electrical codes, laws and ordinances, and assume the liability associated with establishing and maintaining all fire-stops and seals.
6. Unique installations may require special consideration and additional assistance. If this is necessary, please call our Building Industry Consulting Service.

GENERAL NOTES:

The Building Owner is responsible to provide the following items (Applicable as Marked) as required by the General Subscriber Tariff.

1. () 48 hours prior to digging, call 1-800-432-4770 to obtain the Underground Utilities Locator.
2. () Entrance conduits should: (A) be rigid metallic, PVC Schedule 40 or equivalent, (B) total bends not to exceed 180 degrees, (C) buried at a minimum depth of 18", (D) separated from power conduits by a minimum of 3" of concrete or 12" of well tamped earth, (E) equipped with pullstrings, (F) be sealed at both ends (BellSouth to replace seal after placing cable).
3. () Stub up conduit at the bottom left corner of the painted telephone plywood backboard.

4. () Station Conduits should: (A) be metallic in plenum space, (B) total bends not to exceed 180 degrees, (C) not exceed 150 feet. If items (B) or (C) above are exceeded, an accessible pullbox with a removable cover is required in line with the conduit run. Minimum size: 12"L x 6"W x 4"D. (D) All conduits to be equipped with pullstring and sized as specified on riser diagram (No "SMURF" conduits allowed).
5. (X) All conduit bends to be long and sweeping with a minimum radius of 6 times the diameter for conduits up to 2 inches or 10 times for larger conduits (No LB connectors permitted).
6. () Riser sleeves are to be trenched, bushed, extended 2" A.F.F. and equipped with metal caps.
7. (X) Maintain the fire rating off all wall and floor penetrations through which telephone cables pass.
8. (X) Provide an extension of the Building Grounding Electrode System for telephone equipment. The Grounding Conductor must be an insulated copper (solid or stranded) #6 AWG wire, run to the Power Ground Rod in the most direct possible route to minimize voltage potential differences.
9. () 3/4" thick, painted plywood backboard(s), sized as indicated by telephone riser diagram and detail sheets. Backboard(s) should be painted with fire retardant paint.
10. () Provide a 120 volt duplex receptacle adjacent to telephone backboard.
11. (X) Overhead lighting equivalent to 30 foot candles (as measured at floor level), located a minimum of 8'6" above the finished floor.
12. () If elevators are present, the builder should call the Business Office at 780-2800 to order the elevator emergency telephones a minimum of 1 week in advance of the desired service date to prevent a delay in the issuance of the Certificate of Occupancy.
13. (X) It is the intent of these recommendations that equipment for tenant telecommunication requirements be provided in the tenant space. In the event of a joint use telephone room, a distinct separation of telephone company facilities and customer provided equipment must be maintained.
14. () Outside telephone enclosures must meet NEMA 3R standard, sized as shown, equipped with 3/4 inch plywood backboard, a ground wire (see #8 above) and have a hinged, secured cover.
15. () BST recommends all wiring placed by others to be at least 4 pair, Category 3 or better.

FOR TELCO USE ONLY:

16. () If entrance cable protector is more than 50' from building entrance point, cable sheath must be bonded to an approved ground within 50' of entrance point.
17. (X) No exposed PVC telephone cables will be placed by BellSouth in ducts, plenums or air handling equipment rooms used to transport environmental air.

ESBX
V8
MULTISERV PLUS

EQUIPMENT DESCRIPTION	NON-RECURRING	QTY	TOTAL	MONTHLY	QTY	TOTAL	EQUIPMENT DESCRIPTION	NON-RECU	QTY	TOTAL	MONTHLY	QTY	TOTAL
DIGITAL ESBX SYSTEM (M)	\$1,600.00	1	\$1,600.00	NA			MULTISERV PLUS SYSTEM	\$360.00	1	\$360.00	NA		
NETWORK ACCESS (NARS)				\$ 16.95	20	\$ 339.00	NETWORK ACCESS (NARS)				\$ 16.95	20	\$ 339.00
HUNTING ON NARS				\$ 10.24	20	\$ 204.80	HUNTING ON NARS				\$ 10.24	20	\$ 204.80
NETWORK ACCESS LIMITER			NO CHARGE				NETWORK ACCESS LIMITER			NO CHARGE			
SURCHARGE - SPEECHHEAR				\$ 0.10	20	\$ 2.00	SURCHARGE - SPEECHHEAR				\$ 0.10	20	\$ 2.00
FCC ACCESS CHARGE				\$ 6.00	20	\$ 120.00	FCC ACCESS CHARGE				\$ 6.00	201	\$1,206.00
DB1-TERMINATION	\$ 78.00	1	\$78.00	\$ 510.00	1	\$ 510.00	DB1-TERMINATION	\$ 90.00	1	\$90.00	\$ 475.00	1	\$ 475.00
24 DSO ACTVATION	\$ 36.00	24	\$864.00				24 DSO ACTVATION	\$ 18.50	24	\$444.00			
201 DIGITAL STATIONS <2.5M				\$ 4.90	201	\$ 984.90	201STATIONS LINKS WCALL ID				\$ 15.00	201	\$3,015.00
201 ESBX INTERCOM				\$ 10.10	201	\$2,030.10	201FEATURE GRP 2	INC. in ECAS			INC		0
DECAS PER SYSTEM	\$ 1,100.00	1	\$1,100.00	\$ 7.25	1	\$ 7.25	ECAS PER SYSTEM	\$ 725.00	1	\$725.00	INC		
DECAS PER STATION				\$ 0.20	201	\$ 40.20	ECAS PER STATION				\$ 7.00	201	\$1,407.00
CFD/BUSY LINE (PER 5 STA.)	\$ 3.00	41	\$123.00	\$ 0.35	41	\$ 14.35	CFD/BUSY LINE (PER 5 STA.)	INC.	0		INC		
CFD NO ANS. (PER 5 STA.)	\$ 3.00	41	\$123.00	\$ 0.40	41	\$ 16.40	CFD NO ANS. (PER 5 STA.)	INC	0		INC		
CFD VAR. (PER 5 STA.)	\$ 3.00	41	\$123.00	\$ 0.30	41	\$ 12.30	CFD VAR. (PER 5 STA.)	INC	0		INC		
CALL HOLD (PER 5 STA.)	\$ 6.10	41	\$209.10	\$ 0.25	41	\$ 10.25	CALL HOLD (PER 5 STA.)	INC	0		INC		
3WAY/CON.HOLD/TRANS/5 ST	\$ 3.00	41	\$123.00	\$ 5.10	41	\$ 209.10	3WAY/CON.HOLD/TRANS/5 ST	INC	0		INC		
SYSTEM ARS - BASIC	\$ 215.00	1	\$215.00	\$ 16.00	1	\$ 16.00	SYSTEM ARS - BASIC	\$ 630.00	1	\$630.00	\$ 1.40	1	\$ 1.40
ARS PATTERN	\$ 88.00	2	\$176.00	0.7	2	\$ 1.40	ARS PATTERN	INC	0		INC		
TRUNK GROUP TERM IN ARS	\$ 26.00	2	\$82.00	\$ 2.05	2	\$ 4.10	TRUNK GROUP TERM IN ARS	INC	0		INC		
8 DIGIT SCREENING PER LIST	\$ 120.00	2	\$240.00				8 DIGIT SCREENING PER LIST	INC	0				
SYSTEM ASSUMED DIAL '9'	\$ 75.00	1	\$75.00				SYSTEM ASSUMED DIAL '9'	\$ 40.00	1	\$40.00	\$ 1.00	1	\$ 1.00
ASSUMED DIAL '9' PER STA.	\$ 12.25	201	\$2,462.25	\$ 0.50	201	\$ 100.50	ASSUMED DIAL '9' PER STA.	INC	0		INC		
INSTALL 1ST LINE	\$ 56.00	1	\$56.00				INSTALL 1ST LINE	\$ 58.00	1	\$58.00			
INSTALL EACH ADD/LINE	\$ 12.00	200	\$2,400.00				INSTALL EACH ADD/LINE	\$ 12.00	200	\$2,400.00			
TOTAL			\$9,919.35			\$4,622.65	TOTAL			\$4,735.00			\$6,651.20
TOTAL LESS DIS.			\$8,261.91			\$ 23.00	TOTAL LESS DIS.			\$3,939.05			\$ 33.09
				COST PER STATION		\$3,845.58					COST PER STATION		\$5,533.13
				COST PER STATION		\$ 19.13					COST PER STATION		\$ 27.53

ESBX
VS
MULTISERV PLUS

EQUIPMENT DESCRIPTION	NON-RECURRING	QTY	TOTAL	MONTHLY	QTY	TOTAL	EQUIPMENT DESCRIPTION	NON-RECU	QTY	TOTAL	MONTHLY	QTY	TOTAL
DIGITAL ESBX SYSTEM (M)	\$1,500.00	1	\$1,500.00	NA			MULTISERV PLUS SYSTEM	\$ 360.00	1	\$ 360.00	NA		
NETWORK ACCESS (NARS)				\$ 18.95	40	\$ 678.00	NETWORK ACCESS (NARS)				\$ 18.95	40	\$ 678.00
HUNTING ON NARS				\$ 10.24	40	\$ 409.60	HUNTING ON NARS				\$ 10.24	40	\$ 409.60
NETWORK ACCESS LIMITER			NO CHARGE				NETWORK ACCESS LIMITER			NO CHARGE			
SURCHARGE - SPEECH/HEAR				\$ 0.10	40	\$ 4.00	SURCHARGE - SPEECH/HEAR				\$ 0.10	40	\$ 4.00
FCC ACCESS CHARGE				\$ 6.00	40	\$ 240.00	FCC ACCESS CHARGE				\$ 6.00	400	\$ 2,400.00
DS1-TERMINATION	\$ 78.00	2	\$ 156.00	\$ 510.00	2	\$ 1,020.00	DS1-TERMINATION	\$ 90.00	2	\$ 180.00	\$ 475.00	2	\$ 950.00
24 DSO ACTVATION	\$ 36.00	48	\$ 1,728.00				24 DSO ACTVATION	\$ 18.50	48	\$ 888.00			
201 DIGITAL STATIONS <2.5M				\$ 4.90	400	\$ 1,960.00	201STATIONS LINKS WCALL ID				\$ 15.00	400	\$ 6,000.00
201 ESBX INTERCOM				\$ 10.10	400	\$ 4,040.00	201FEATURE GRP 2	INC. In ECAS			INC		0
DECAS PER SYSTEM	\$ 1,100.00	1	\$ 1,100.00	\$ 7.25	1	\$ 7.25	ECAS PER SYSTEM	\$ 725.00	1	\$ 725.00	INC		
DECAS PER STATION				\$ 0.20	400	\$ 80.00	ECAS PER STATION				\$ 7.00	400	\$ 2,800.00
CFD/BUSY LINE (PER 5 STA.)	\$ 3.00	80	\$ 240.00	\$ 0.35	80	\$ 28.00	CFD/BUSY LINE (PER 5 STA.)	INC.	0		INC		
CFD NO ANS. (PER 5 STA.)	\$ 3.00	80	\$ 240.00	\$ 0.40	80	\$ 32.00	CFD NO ANS. (PER 5 STA.)	INC	0		INC		
CFD VAR. (PER 5 STA.)	\$ 3.00	80	\$ 240.00	\$ 0.30	80	\$ 24.00	CFD VAR. (PER 5 STA.)	INC	0		INC		
CALL HOLD (PER 5 STA.)	\$ 5.10	80	\$ 408.00	\$ 0.25	80	\$ 20.00	CALL HOLD (PER 5 STA.)	INC	0		INC		
3WAY/CON.HOLD/TRANS/5 ST	\$ 3.00	80	\$ 240.00	\$ 5.10	80	\$ 408.00	3WAY/CON.HOLD/TRANS/5 ST	INC	0		INC		
SYSTEM ARS - BASIC	\$ 215.00	1	\$ 215.00	\$ 16.00	1	\$ 16.00	SYSTEM ARS - BASIC	\$ 630.00	1	\$ 630.00	\$ 1.40	1	\$ 1.40
ARS PATTERN	\$ 88.00	2	\$ 176.00	\$ 0.70	2	\$ 1.40	ARS PATTERN	INC	0		INC		
TRUNK GROUP TERM IN ARS	\$ 26.00	2	\$ 52.00	\$ 2.05	2	\$ 4.10	TRUNK GROUP TERM IN ARS	INC	0		INC		
6 DIGIT SCREENING PER LIST	\$ 120.00	2	\$ 240.00				6 DIGIT SCREENING PER LIST	INC	0				
SYSTEM ASSUMED DIAL '9'	\$ 75.00	1	\$ 75.00				SYSTEM ASSUMED DIAL '9'	\$ 40.00	1	\$ 40.00	\$ 1.00	1	\$ 1.00
ASSUMED DIAL '9' PER STA.	\$ 12.25	400	\$ 4,900.00	\$ 0.50	400	\$ 200.00	ASSUMED DIAL '9' PER STA.	INC	0		INC		
INSTALL 1ST LINE	\$ 56.00	1	\$ 56.00				INSTALL 1ST LINE	\$ 66.00	1	\$ 66.00			
INSTALL EACH ADDLINE	\$ 12.00	399	\$ 4,788.00				INSTALL EACH ADDLINE	\$ 12.00	399	\$ 4,788.00			
TOTAL			\$18,364.00			\$9,172.35	TOTAL			\$7,857.00			\$13,244.00
TOTAL LESS DIS.			\$13,804.89	COST PER STATION		\$ 22.83	TOTAL LESS DIS.			\$6,389.68	COST PER STATION		\$ 33.11
				COST PER STATION		\$7,630.48					COST PER STATION		\$11,017.68
						\$ 19.08					COST PER STATION		\$ 27.54

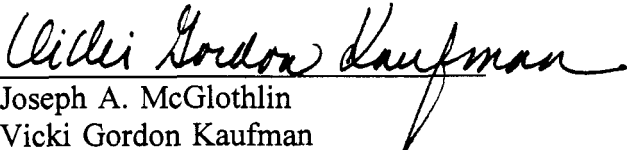
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing **Direct Testimony and Exhibits of Elder N. Ripper, III**, has been furnished by Unites States Mail, Hand Delivery (*) or Federal Express (**) this **3rd** day of **December, 1998**:

June McKinney*
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

Mary K. Keyer**
BellSouth Telecommunications, Inc.
675 West Peachtree Street, N.E.
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Telephone: (850) 222-2525

Attorneys for the Telephone Company
of Central Florida