frontier.

180 South Clinton Avenue Rochester, NY 14646

December 18, 1998

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DEC 2: .

Walter D'Haeseleer, Director Division of Communications Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32310

CMU

RE: Petition for Waiver of Bonding Requirement

Dear Mr. D'Haeseleer:

On behalf of Allnet Communication Services, Inc. d/b/a Frontier Communications Services, I am submitting one (1) original and two (2) copies of a Petition for Willyer of Bonding Requirement.

Please contact me at 716.777.8456 for any additional information the Commission may need to process and grant this Petition.

A. 1 — Sincerely,

Michael J. Nighan

Director - Regulatory Affairs

Frontier Communications

Enclosures

Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:)	
ALLNET COMMUNICATION SERVICES, INC.)	
d/b/a Frontier Communications Services	5	Docket
Petition for Waiver of)	
Bonding Requirement)	

PETITION FOR WAIVER OF BONDING REQUIREMENT

Allnet Communication Services. Inc. d/b/a Frontier Communications Services (FCS), by its attorneys, requests a waiver of the Commission's bonding requirement to secure customer deposits, as embodied in Rule 25-24.490(2). In support of its Petition for Waiver, FCS submits the following:

- FCS is headquartered at 180 South Clinton Avenue, Rochester, NY 14646.
- All notices, pleadings, and orders should be directed to the following FCS representative:

Michael Nighan Director, Regulatory Affairs 180 South Clinton Avenue Rochester, NY 14646 Telephone: (716) 777-8456 Facsimile: (716) 232-3646

 FCS is an interexchange carrier (IXC) certified by the Florida Public Service Commission, and is currently providing interexchange services to its customers within the State of Florida.

FESC RECORDS/REPORTING

- FCS is a wholly owned subsidiary of Frontier Corporation (Frontier).
 FCS has consistently provided high quality, low cost, interexchange services since its certification in Florida (originally certificated as Allnet Communication Services, Inc.)
- 5. FCS would be required to maintain a bond covering its balance of deposits and advance payments (for more than one month's service). This rule provides that a waiver may be obtained, "by demonstrating that it possesses the financial resources and income to provide assurance of continued operation under no certificate over the long term."
- 6. Because of FCS's significant financial position, FCS requests waiver of the bonding requirement. In order to demonstrate its financial resources and income to provide assurance of long term operation under its certificate, FCS is appending as Exhibit "1" a copy of Frontier Corporation's 1997 Annual report which contains audited financial statements for Frontier Corporation.
- Given the relatively small amount of customer deposits FCS retains and the financial viability of FCS and its parent, FCS submits it has demonstrated sufficient justification for waiver of the bonding requirement.

WHEREFORE, Allnet Communication Services, Inc. d/b/a Frontier

Communications Services requests a waiver of the bonding requirement pursuant to

Commission Rule 25-24.490(2), for deposits held by FCS to secure Florida accounts.

Respectfully submitted this $\frac{\sqrt{g^{1/k}}}{2}$ day of December 1998.

By:

Michael Y. Shortley III

Senior Attorney &

Director of Regulatory Services Allnet Communication Services, Inc d/b/a Frontier Communications Services