

ORIGINAL



30  
FEB -9 PH 4:43

Charles J. Rehwinkel  
County Attorney

FOIA  
1000  
1000  
1000  
1000

RECORDS AND  
REPORTING

February 9, 1999

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

RE: Docket No. 941281-TL

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of Sprint's Motion for a limited extension of time to comply with the requirements of Order No. 98-0308-FOF-TL for filing in the above matter. Service has been made as indicated on the Certificate of Service.

Please acknowledge receipt of these documents by stamping the extra copy of this letter and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_ Charles J. Rehwinkel

CAF \_\_\_\_\_  
CMU Sheffer CJR/bs

CTR \_\_\_\_\_ Enclosures

EAG \_\_\_\_\_  
LEG 1 cc: Parties of Record

LMI 2

OFF \_\_\_\_\_

RCH \_\_\_\_\_

SEP 1

WAS \_\_\_\_\_

OTH \_\_\_\_\_

RECEIVED & FILED  
Sheffer  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

01727 FEB-98

FPSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by subscribers ) Docket No. 941281-TL  
of the Groveland exchange for )  
extended area service (EAS) to )  
the Orlando, Winter Garden, and ) Filed: February 8, 1999  
Windermere exchanges )

**Motion by Sprint-Florida, Incorporated for a Limited Extension of Time to Comply with the Requirements of Order No. 98-0308-FOF-TL**

Sprint-Florida, Incorporated (Sprint) requests a limited modification of the requirements of Order No. PSC-98-0308-FOF-TL, Issued February 23, 1998.<sup>1</sup> Sprint seeks relief in the form of an extension of time of approximately 60 days to implement Extended Area Service (EAS) on the Groveland to Windermere and Groveland to Winter Garden routes ("intermediate routes"). In support, Sprint states:

On November 11, 1994, the Commission opened this docket to evaluate a petition by Groveland customers for EAS to Orlando. The Windermere and Winter Garden routes were evaluated due to "leapfrogging."<sup>2</sup> Traffic studies demonstrated that EAS from Groveland to Orlando was warranted. Balloting at the 25/25 plus regrouping additive (\$3.87, residential; \$9.13, business) passed. EAS on the primary route (Groveland to Orlando) and

---

<sup>1</sup>Sprint does not seek a waiver pursuant to Section 120.542, Fla. Stat. which only applies to waivers of rules.

<sup>2</sup>Leapfrogging occurs when all or a portion of a non-EAS exchange lies between a requesting and the desired exchange.

the intermediate routes was ordered.

Because BellSouth is currently prohibited from carrying certain interLATA traffic, BellSouth was ordered to seek a waiver from the FCC. In the order, the Commission directed Sprint to implement EAS on the intermediate routes by February 23, 1999 since the routes are intracompany. BellSouth was ordered to implement EAS within twelve months of receiving a waiver. BellSouth received its waiver on July 14, 1998. Under the Commission's Order, service from Groveland to Orlando must be in place twelve months from that date.

In ordering the intermediate routes to be implemented ahead of the Groveland/Orlando route, the Commission did not establish an interim EAS additive. The ordered residential EAS additive, for example, was calculated at time of hearing based on the 25/25 plan consisting of an EAS additive of \$2.37<sup>3</sup>, plus a regrouping additive of \$1.50.<sup>4</sup> If, hypothetically, an additive was to be derived for the intermediate exchanges only, the combined number of subscribers in the two exchanges of Windermere and Winter Garden would fall within Sprint's rate group 2 (United) and the resulting twenty five percent of the residential rate is \$1.81.

Of course, the Commission did not order an interim additive. The order did

---

<sup>3</sup>This additive is based on 25% of the hypothetical Sprint rate group price that the total incremental calling scope (Windermere, Winter Garden and Orlando exchanges) would require if a stand alone exchange.

<sup>4</sup>Total Groveland calling scope will place it in rate group 6 (United). The regrouping additive is the difference between the existing Groveland rate of \$8.73 (rate group 4) and the rate group 6 rate of \$10.23.

not expressly foreclose the possibility of one in the event Sprint was required to implement EAS on the intermediate routes substantially in advance of the implementation date of the Groveland to Orlando Route. Sprint would have likely sought to implement an interim additive had this been the case.

Fortunately, the waiver from the FCC was received in a timely fashion such that all routes can be reasonably implemented at the same time and within the general time frame that the Commission desired. Sprint and BellSouth are scheduled to implement the Groveland/Orlando route on or about April 30. A delay of approximately 60 days in the implementation of the intermediate routes would allow all routes to go in at the same time and avoid customer confusion about the status of calling to Orlando and avoid the inequity to Sprint of implementing EAS without compensation for lost toll revenues. This is especially appropriate since intermediate EAS would not have been warranted on a stand-alone basis if Groveland/Orlando EAS had not been ordered under the Commission's longstanding "leapfrogging" policy.<sup>5</sup>

Sprint further submits that the additional time will allow the company to acquire a sufficient number of Central Florida telephone directories required to meet the provisions of FPSC rule 25-4.040, F.A.C. Currently these directories are in short supply due to rapid growth in the area. At this time Sprint may not have enough on hand to provide one to each Groveland

---

<sup>5</sup>See, Order No. PSC-97-1309-FOF-TL, issued October 22, 1997 (*Ordering balloting by the Groveland customers*). Both the intermediate routes "failed to meet either of the minimum requirements." Order at 5.

subscriber. Additional time afforded by an extension will allow Sprint to insure adequate directory distribution.

Wherefore, for the above reasons, Sprint respectfully requests the Commission allow a brief extension from February 23, 1999 until April 30, 1999 for implementation of EAS on the Groveland/Windermere and Groveland/Winter Garden exchanges.

Submitted this 8<sup>th</sup> day of February 1999.

A handwritten signature in black ink, appearing to read "C. Rehwinkel", written over a horizontal line.

Charles J. Rehwinkel  
Senior Attorney  
Sprint-Florida, Incorporated  
P.O. Box 2214  
MC FLTLHO0107  
Tallahassee, Florida 32301  
850/847-0244

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT THE FOREGOING WAS SERVED BY U.S. MAIL OR HAND DELIVERY (\*) TO THE FOLLOWING:

Richard Wagner  
304 E. Colonial Dr.  
Orlando, FL 32801

Florida Competitive Carriers Assoc.  
c/o J.P. Gillan and Associates  
P.O. Box 541038  
Orlando, FL 32854-1038

Carroll Fulmer & Co., Inc.  
Carroll Fulmer  
P.O. Box 5000  
Groveland, FL 34736-5000

Ms. Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

Vicki Kaufman  
17 S. Gadsden St.  
Tallahassee, FL 32301

Mary Beth Keating (\*)  
Division of Legal Services  
Florida Public Service Commission  
3540 Shumard Oak Blvd.  
Tallahassee, Florida 32399

  
Charles J. Rehwinkel