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

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In re: IntraLATA Presubscription

Dear Ms. Bayo:

The Federal Communications Commission (FCC) recently issued an Order in CC Docket 96-98 that establishes dates for the implementation of toll dialing parity plans (intraLATA presubscription).

The FCC states in its Order that the State of Florida is one of several states that has already implemented intraLATA toll dialing parity, and we agree. The Florida Public Service Commission (FPSC) has issued orders that we believe constitute the adoption of an intraLATA toll dialing parity plan. These FPSC orders were issued primarily in Dockets 930330-TP, and the plan is being implemented.

To the degree that the FCC requires Florida LECs to submit a toll dialing parity plan, ITS Telecommunications Systems, Inc. (ITS) submits that its plan is the plan set forth in the previously issued FPSC orders. Under the ITS plan ITS will, upon a bona fide request for intraLATA presubscription negotiate the provision of such service that is satisfactory to the parties and then provide such service, or seek assistance from the FPSC in reaching an agreement, as outlined in the plan.

Please advise us in the event that the Commission needs something more than this letter.

Sincerely,

David B. Erwin

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Don Hartsfield, ITS

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