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February 19, 2001

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

Re: Docket No. 001762-TC
Proposed Rule 25-24.517, F.A.C., Location of Pay Telephones

Dear Ms. Bayo:

On January 10, 2001, Staff conducted a workshop in the above docket and requested post-workshop comments from the parties. Verizon Florida Inc. (Verizon) concurs with the comments filed February 16, 2001, by Florida Public Telecommunications Association, Inc. (FPTA) regarding Staff's proposed changes to pay telephone rules.

With regard to Item 2, Verizon believes that five feet from the fire hydrant, in any direction, will allow for ten feet of curbside hydrant access, which should be sufficient for hydrant use. Providing for 50 feet of curb access on either side of a hydrant, effectively 100 feet of curb access, would be unnecessarily excessive, and could, depending upon the business location dimensions, potentially eliminate the possibility of a payphone installation at an otherwise deserving location.

With regard to Item 4, Verizon would add that, without expanding the provision as suggested by FPTA, it could be inferred that local government has authority to require pay telephone providers to seek approval for all installations "mounted on or overhanging sidewalks" other than just those located in the public rights-of-way. As indicated in FPTA's analysis of the Commission's legal authority to impose restrictions on the location of pay telephones, the Commission is "the only body within the State of Florida that has such authority."

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With regard to Item 5, Verizon emphasizes that local government should be permitted to remove only those pay telephones that are deemed "abandoned" by the Commission and located in the public rights-of-way.

If there are any questions regarding these comments, please contact me at 813-483-2617.

Sincerely,


ba Kimberly Caswell

KC:tas

c: Staff Counsel