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May 16, 2001

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

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Re: Docket No. 991376-TL
Initiation of Show Cause Proceedings against GTE Florida, Inc., for
Violation of Service Standards

Dear Ms. Bayo:

Please find enclosed Verizon Florida Inc.'s Prehearing Statement for filing in the
above matter. Also enclosed is a diskette with a copy of the Prehearing Statement
in Word 97 format. Service has been made as indicated on the Certificate of Service.
If there are any questions regarding this matter, please contact me at 813-483-2617.

Sincerely,

Kimberly P. Caswell
Kimberly Caswell

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of show cause) Docket No. 991376-TL
proceedings against GTE Florida) Filed: May 16, 2001
Incorporated for violation of service)
standards)
_____)

VERIZON FLORIDA INC.'S PREHEARING STATEMENT

Verizon Florida Inc. (Verizon) (formerly GTE Florida Incorporated) files its Prehearing Statement in accordance with Order number PSC-00-0686-PCO-TP in this docket and Commission Rule 25-22.038.

A. Witnesses

Verizon's witnesses for this proceeding and the issues to which they will testify are as follows:

John A. Ferrell: Issues 1 and 2.

Russell B. Diamond: Issues 1 and 2.

John C. Appel: Issues 1 and 2.

B. Exhibits

Verizon will introduce the following exhibits:

1. Ex. JAF-1, Comparison of PSC Standards
- Ex. JAF-2, April 2, 1998 Kampert Letter with Service Report Attachments
- Ex. JAF-3, Operations Reports Excerpts
- Ex. JAF-4, Daks Letters and Reports
- Ex. JAF-5, September 1999 Repair Action Plan
- Ex. JAF-6, Repair Improvement Plan
- Ex. JAF-7, Dispatch Reduction Plan

DOCUMENT NUMBER-DATE

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- Ex. JAF-8, Florida PSC Service Improvement Plan
- Ex. JAF-9, Florida Results E-mail.
- Ex. JAF-10, Service Standard Miss Explanations
- Ex. JAF-11, Lightning Stroke Report
- Ex. JAF-12, Weather Documents
- 2. Ex. RBD-1, 1998 Projected and Actual Dispatches
- Ex. RBD-2, Hiring Requisitions Log
- 3. Ex. JCA-1, Florida PSC Measures Correspondence
- Ex. JCA-2, March 17, 1998 Daks Note
- Ex. JCA-3, August 26, 1999 Keith Note
- Ex. JCA-4, December 3, 1999 Appel Note

Verizon reserves the right to introduce additional exhibits at the hearing or other appropriate points.

C. Verizon's Basic Position

Verizon did not willfully violate the Commission's repair and installation standards at issue in this case. Meeting Commission service standards has always been a top priority for Verizon management at the local and national levels. While Verizon did miss the standards in limited circumstances, there were good reasons for these misses, and none of them was in any way intentional. Verizon explained the reasons for any misses in its quarterly service quality reports filed with the Commission, and reasonably assumed these explanations were acceptable—particularly in view of the fact that Florida's exchange-specific standards are some of the toughest in the country.

In any event, Verizon has sustained compliance with the Commission's repair and

installation standards for all of last year and this year to date. These improved service levels are the result of action plans developed by local management well before this docket was initiated. These compliance statistics prove that effective and efficient management is the key to maintaining compliance with Commission service standards.

D., E., F., G. Verizon's Specific Positions

Verizon believes the issues identified for resolution in this case are mixed questions of fact, law, and policy.

Issue 1: (a) During the time period of January 1996 through December 1999, was GTE Florida Incorporated in willful violation of Rule 25-4-4.070(3)(a), Florida Administrative Code, which requires restoration of interrupted service within 24 hours of report for 95% of the repairs in each exchange?

(b) If so, how many violations were there, if any, and what is the appropriate action, penalty, and/or fine amount to be imposed by the Commission for any rule violations?

Verizon's Position: (a) No.

(b) Because Verizon did not willfully violate the repair standard at issue, the Commission may not fine or otherwise penalize Verizon.

Issue 2: (a) During the time period of January 1996 through December 1999, was GTE Florida Incorporated in willful violation of Rule 25-4.066(2), Florida Administrative Code, which requires installation of primary service within 3 working days for 90% of the installations in each exchange?

(b) If so, how many violations were there, if any, and what is the appropriate action, penalty, and/or fine amount to be imposed by the Commission for any violations?

Verizon's Position: (a) No.

(b) Because Verizon did not willfully violate the installation standard at issue, the Commission may not fine or otherwise penalize Verizon.

H. Stipulated Issues

There are no stipulated issues at this time.

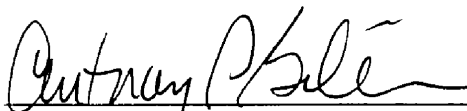

I. Pending Matters

Verizon is unaware of any pending matters.

J. Procedural Requirements

To the best of its knowledge, Verizon can comply with all requirements set forth in the procedural order in this case.

Respectfully submitted on May 16, 2001.

By: 
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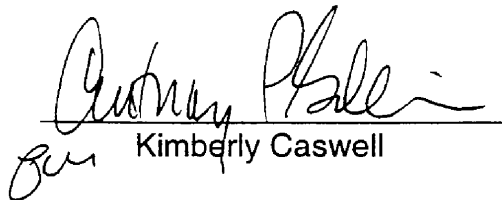
Attorney for Verizon Florida Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Prehearing Statement in Docket No. 991376-TL were sent via U.S. mail on May 16, 2001 to:

Lee Fordham, Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Charles J. Beck, Deputy Public Counsel
Office of Public Counsel
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400


Kimberly Caswell