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Electronic Filing

a. Person responsible for this electronic filing:

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b. Docket No. 050693-TL

In re: Alltel Florida, Inc.'s Petition To Reduce Intrastate Switched Network Access Rates In A Revenue Neutral Manner Pursuant to Section 364.164, Florida Statutes.

c. Document being filed on behalf of Office of Public Counsel

d. There are a total of 7 pages.

e. The document attached for electronic filing is Citizens' Prehearing Statement.

(See attached file: 050693 Prehearing Statement e-filed version.doc)

Thank you for your attention and cooperation to this request.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Alltel Florida, Inc.'s Petition)	
To Reduce Intrastate Switched Network)	
Access Rates In A Revenue Neutral)	Docket No. 050693-TL
Manner Pursuant to Section 364.164,)	Filed: November 14, 2005
Florida Statutes)	
_____)	

CITIZENS' PREHEARING STATEMENT

The Citizens of Florida, through Harold McLean, Public Counsel, file this prehearing statement pursuant to the Order Establishing Procedure, order no. PSC-05-0959-PCO-TL issued October 7, 2005, and Order Modifying Procedure, order no. PSC-05-1130-PCO-TL issued November 10, 2005.

Witnesses and Exhibits

Citizens have not sponsored a witness in this proceeding and have no exhibits to identify at this time.

Basic Position

Alltel's residential customers will pay among the highest basic local exchange rates in Florida, while at the same time Alltel's customers will receive virtually no offsetting benefit in long distance rate reductions, if the Commission approves Alltel's rate rebalancing proposal. Alltel has not made a convincing case that customers will have any additional competitive alternatives, or that the price of competitive alternatives will be any more attractive, as a result of Alltel's local rate increase and rate

rebalancing. Competitors generally set their rates on a nationwide basis and are unlikely to change their rates in response to rate rebalancing by Alltel Florida. Residential customers will simply pay more for the same services from Alltel if the Commission grants Alltel's petition.

Alltel's rate rebalancing proposal should be denied. If the Commission nevertheless decides to approve Alltel's rate rebalancing proposal, the approval should be made contingent upon Alltel offering stand-alone DSL to all of its customers at a price no higher than the lowest price at which it is offered in any of its packages of services.

Issues and Positions

Issue 1: Will Alltel's rebalancing proposal remove the current support for basic local telecommunications services that prevents the creation of a more attractive competitive market for the benefit of residential consumers?

Citizens' Position: No, for the reasons set forth in part C.

(A) What is a reasonable estimate of the level of support provided for basic local telecommunications service.

Citizens' Position: No position.

(B) Does the current level of support prevent the creation of a more attractive competitive local exchange market for the benefit of residential consumers?

Citizens' Position: Alltel has not met its burden of proof on this issue.

(C) Will Alltel's rebalancing proposal benefit residential consumers as contemplated by Section 364.164, Florida Statutes? If so, how.

Citizens' Position: No. Alltel's residential customers will pay among the highest basic local exchange rates in Florida, while at the same time Alltel's customers will receive virtually no offsetting benefit in long distance rate reductions, if the Commission approves Alltel's rate rebalancing proposal. Alltel has not made a convincing case that customers will have any additional competitive alternatives, or that the price of competitive alternatives will be any more attractive, as a result of Alltel's local rate increase and rate rebalancing. Competitors generally set their rates on a nationwide basis and are unlikely to change their rates in response to rate rebalancing by Alltel Florida. Residential customers will simply pay more for the same services from Alltel if the Commission grants Alltel's petition.

Issue 2: Will the effects of Alltel's rebalancing proposal induce enhanced market entry. If so, how?

Citizens' Position: Alltel has not met its burden of proof on this issue.

Issue 3: Will Alltel's rebalancing proposal reduce intrastate switched network access rates to interstate parity over a period of not less than two years or more than four years?

Citizens' Position: No position.

Issue 4: Is Alltel's rebalancing proposal revenue neutral, as defined in Section 364.164(2), Florida Statutes?

Citizens' Position: No position.

Issue 5: Should Alltel's rebalancing proposal be granted or denied?

Citizens' Position: Alltel's rate rebalancing proposal should be denied. If the Commission nevertheless decides to approve Alltel's rate rebalancing proposal, the approval should be made contingent upon Alltel offering stand-alone DSL to all of its customers at a price no higher the lowest price at which it is offered in any of its packages of services.

Issue 6: Should the IXC flow through procedures addressed in Docket No. 030961-TI and ordered in PSC-03-1469-FOF-TL, be applied to Alltel's rebalancing proposal?

Citizens' Position: Yes.

Issue 7: Would the Commission's approval of Alltel's rebalancing proposal be consistent with the section 364.01(4)(a), Fla. Stat.?

Citizens' Position: No, the price for basic local telecommunications service will be less reasonable and affordable if the Commission grants Alltel's petition, and Alltel hasn't done enough to promote Lifeline and Link-Up. Although Alltel's Lifeline subscribership jumped between January 1, 2003, and January 1, 2004, when Lifeline was heavily promoted in the media by BellSouth, Verizon, and Sprint, Alltel's Lifeline subscribership recently declined between January 1, 2004, and January 1, 2005.

Issue 8: Should the docket be closed?

Citizens' Position: No position.

Stipulated Issues

Citizens have not stipulated to any issues.

Pending Motions

Citizens have not pending motions.

Pending Requests or Claims for Confidentiality

Citizens have no pending requests or claims for confidentiality.

Requirements of Order Establishing Procedure

Citizens believe that we have complied with the requirements of the order establishing procedure.

Decision or Pending Decision of the FCC , State or Federal Courts

Citizens have none to identify at this time.

Objections to Witness's Qualification as an Expert

Citizens do not object to the qualifications of any witness.

Respectfully submitted,

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s/ Charles J. Beck
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DOCKET NO. 050693-TL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail or hand-delivery to the following parties on this 14th day of November, 2005.

s/ Charles J. Beck
Charles J. Beck

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