

Matilda Sanders

From: Kelly, Tamela D [LTD] [Tamela.Kelly@embarq.com]
Sent: Friday, September 15, 2006 3:58 PM
To: Filings@psc.state.fl.us
Cc: Masterton, Susan S [LTD]
Subject: Docket 060476-TL, Embarq's Comments
Attachments: 060476-TL, Embarq's Comments.pdf

Filed on Behalf of: **Susan S. Masterton**

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Embarq Florida, Inc.
1313 Blair Stone Road
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Docket No. **060476-TL**

Title of filing: **Embarq's Comments to BellSouth's Petition to initiate rulemaking**

Filed on behalf of: **Embarq Florida, Inc.**

No of pages: **4 pages**

Description: **Embarq's Comments to BellSouth's Petition to initiate rulemaking to amend Rules 25-24.630(1) and 25.24.516(1), F.A.C.**

<<060476-TL, Embarq's Comments.pdf>>

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September 15, 2006

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
& Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 060476-TL

Dear Ms. Bayó:

Enclosed for filing on behalf of Embarq Florida, Inc., are Embarq's comments to BellSouth's Petition to initiate rulemaking to amend Rules 25-24.631(1) and 25.24.516(1), F.A.C.

Copies are being served pursuant to the attached certificate of service.

If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Susan S. Masterton

Enclosure

Susan S. Masterton
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DOCUMENT NUMBER-DATE

08522 SEP 15 06

FPSC-COMMISSION OF PUBLIC SERVICE

**CERTIFICATE OF SERVICE
DOCKET NO. 060476-TL**

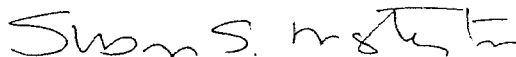
I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 15th day of September, 2006 to the following:

Florida Public Service Commission
Richard Bellak
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Florida Public Service Commission
Rick Moses
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

BellSouth Telecommunications, Inc.
J. Meza/E. Edenfield/M. Gurdian
c/o Ms. Nancy S. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32303-1556

Abel Law Firm
Steven H. Denman
P.O. Box 49948
Sarasota, FL 34230-6948



Susan S. Masterton

FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to initiate rulemaking to amend Rules 25-24.630(1) and 25.24.516(1), F.A.C., by BellSouth Telecommunications, Inc.

Docket No. 060476-TL

Filed: September 15, 2006

COMMENTS OF EMBARQ FLORIDA, INC., REGARDING PETITION TO INITIATE RULEMAKING TO AMEND RULES 25-24.630 (1) AND 25.24.516(1), F.A.C., BY BELLSOUTH TELECOMMUNICATIONS, INC.

Embarq Florida, Inc. submits the following comments in support of BellSouth's Petition:

With regard to the rates for Operator Services for the Hospitality Industry and pay telephones, Embarq believes that numerous viable alternatives exist for these services and there are not any overwhelming reasons why greater pricing flexibility should not be allowed for these services. These services are already deregulated in the interstate jurisdiction and approximately 40% of the state jurisdictions. Alternatives to services include wireless service, prepaid wireless service, toll free numbers, debit cards, calling cards, credit cards and VOIP via wireless or fixed connections.

For hospitality services it is unlikely that hotel/motels will allow or charge rates which would be detrimental to their primary guest functions. Further, as long as the service providers display and/or quote their rate and surcharges, potential customers have advance notice and can seek an alternative or at their discretion, elect not to use the service at that location or at that time.

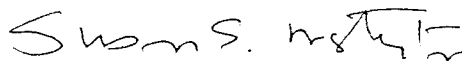
There has been tremendous change in communications services and change will continue. Clearly, it is best, where alternatives exist, to allow the market to determine

what services will be offered and at what rates. In some cases, e.g., pay telephones services, if the provider does not have the flexibility to price services to adequately cover cost, then the service provider may exit a particular market. Given the above, Embarq supports BellSouth's petition to eliminate the rate caps or in the alternative, increase the caps for operator and pay telephone services.

If rate caps for these services are to be maintained, Embarq proposes that the rate cap for person-to-person calls be set at a minimum of \$6.50 and the rate cap for non-person-to-person be set at \$3.95. These are currently the maximum rates Embarq charges for these services in Georgia, which does not cap these rates. For the maximum per minute rate Embarq proposes a rate of not less than \$.50, which is an approximate average of the per-minute rate for pay telephone and operator services long distance calls for all Embarq states.

With regard to inmate/confinement operator services (IOS), Embarq takes no position on changes to the rate caps.

Respectfully submitted this 15th day of September 2006.



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