



RECEIVED -FPSC

12 MAR -2 PM 2:46

COMMISSION
CLERK

29 February 2012

Judy Harlow
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Industry survey for legislative review of agency rules in the effect on or before November 16, 2010,
Docket No. 110303-OT

Dear Ms. Harlow:

Enclosed are the responses of Peerless Network of Florida, LLC (TK086) to the data requests of the Commission staff in the above listed docket. Along with the original and seven copies is a CD-ROM disk with an electronic copy.

If there are any questions concerning this filing, please feel free to contact me at 312-506-0933 or at dmeldazis@peerlessnetwork.com. Thank you.

Sincerely,

Daniel Meldazis
Director Regulatory Affairs

Attachement

COM _____
APA _____
ECR _____
GCI FF+CD
RAD _____
SRC _____
ADM _____
OPC _____
CLK _____

222 S Riverside Plaza, Suite 2730, Chicago, IL 60606
Phone: 312-506-0920

DOCUMENT NUMBER - DATE

01266 MAR -2 12

FPSC-COMMISSION CLERK

Rule 25-4.0161, F.A.C. – Survey Questions

The following survey questions apply to **Rule 25-4.0161, F.A.C., Regulatory Assessment Fees; Telecommunications Companies**. For responding to these questions, please refer to Subsection 120.541(2), F.S., and Subparagraph 120.745(1)(b)2, F.S. “Transactional costs” are defined in Subparagraph 120.541(2)(d), F.S., as:

...direct costs that are readily ascertainable based upon standard business practices, including filing fees, the cost of obtaining a license, the cost of equipment required to be installed or used or procedures required to be employed in complying with the rule, additional operating costs incurred, the cost of monitoring and reporting, and any other costs necessary to comply with the rule.

The company’s response data to these survey questions should be provided for the entire rule, unless the response data is available by rule section, in which case we request the response data be provided by rule section. Please present data in annualized format, if possible, and all cost or benefit dollar estimates should be stated in nominal terms.

1. What are the estimated transactional costs resulting from the Company’s compliance of Rule 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?
 - a. What are your actual transactional costs resulting from your Company’s compliance with Rule 25-4.0161, F.A.C., for the period July 1, 2011 through December 31, 2011?

Answer: The estimated transactional costs for compliance with Rule 25-4.0161, F.A.C. for Peerless Network of Florida, LLC (Peerless) for the five year period beginning July 1, 2011 is \$500. The actual transaction costs for compliance with the rule for the period of July through December 2011 is \$60.

2. What is your estimate of the likely impact, stated in terms of costs and/or benefits, on small businesses (as defined by Section 288.703, F.S.) located in the Company’s service territory, resulting from the compliance of Rule 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

Answer: Peerless does not foresee any likely impact on small business located in the company’s service territory resulting from its compliance with the rule.

3. What is your estimate of the likely impact, stated in terms of costs and/or benefits, on small counties and small cities (as defined in Section 120.52, F.S.) located in the Company’s service territory, resulting from the compliance of 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

Answer: Peerless does not foresee any likely impact on small counties and small cities located in the company’s service territory resulting from its compliance with the rule.

4. What is your estimate of the likely impact, stated in terms of costs and/or benefits, on entities located in the Company’s service territory other than those specifically identified in Questions 2 and 3, resulting from the compliance of 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

Answer: Peerless does not foresee any likely impact on entities located in the company’s service territory other than those specifically indentified in Questions 2 and 3 resulting from its compliance with the rule.

5. What expected impact do you believe Rule 25-4.0161, F.A.C., will have on economic growth, private sector job creation or employment, and private sector investment for the five year period July 1, 2011 in the Company’s service territory?

Answer: Peerless does not foresee any likely impact economic growth, private sector job creation or employment, and private sector investment resulting from its compliance with the rule.

Respondent: Daniel Meldazis, Director Regulatory Affairs

6. What expected impact do you believe Rule 25-4.0161, F.A.C., will have on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets, productivity, and innovation, for the five year period July 1, 2011?

Answer: Peerless does not foresee any likely impact business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets, productivity, and innovation, resulting from its compliance with the rule.

7. What are the benefits to your Company associated with Rule 25-4.0161, F.A.C.?

Answer: The provision of telecommunications is a vital part of the nation's economy and requires a certain level of regulation to insure that qualified companies engage in the provision of telecommunications services.

8. Since the December 4, 2011 rule change has your Company revised customer rates in order to comply with Rule 25-4.0161, F.A.C.? If so, please explain any rate changes that were made.

Answer: Peerless did not add the cost of compliance to Commission rules in its rates to its customers. So no adjustment was needed.

9. If the Company did revise customer rates after the rule change, what were the specific costs associated with processing and implementing these rate changes?

Answer: Not applicable, See answer to Question 8.

10. Does the Company anticipate having to revise customer rates in the future in order to comply with Rule 25-4.0161, F.A.C.? If so, please explain any anticipated rate changes for the five year period beginning July 1, 2011.

Answer: No

11. If the company anticipates revising customer rates in order to comply with Rule 25-4.0161, F.A.C., what costs does the company expect to incur to process and implement the rate changes for the five year period beginning July 1, 2011?

Answer: Not applicable, See answer to Question 10.