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March 7, 2014

VIA ELECTRONIC MAIL

Ms. Laura King, Economic Analyst
Division of Economics
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
lking@psc.state.fl.us

Re: Docket No. 120208-TX - Petition to initiate rulemaking to revise and amend Rule 25-22.0365, F.A.C., by Competitive Carriers of the South, Inc.

Dear Ms. King:

In response to the Commission staff's February 19, 2014, request for information regarding any potential economic impacts of the proposed changes to Rule 25-22.0365, F.A.C., the Competitive Carriers of the South, Inc., ("CompSouth") offers the following assessment.

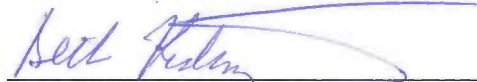
The economic impact, if any, of the proposed changes is difficult, at best, to quantify. The addition of language in paragraph (2) of the Rule could provide an avenue for more quickly resolving inter-carrier disputes, which may in some cases, produce litigation cost savings. However, the interpretation, application, and "user-friendliness" of the Rule remains to be seen; thus, there is the potential that savings, if any, will be limited.

It is, therefore, CompSouth's assessment that implementation of the Rule in its current form will have no direct and immediate economic impact. Moreover, the economic impact, if any, over

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the long term cannot be quantified.

Sincerely,



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cc:// Parties of Record
Docket File (Docket 120208-TX)