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REPLY TO: Tallahassee

December 6, 1993

Mr. Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

HAND DELIVERED

Re: Docket No. ~~920260-TL~~, 910163-TL, 910727-TL, 900960-TL and
911034-TL

Dear Mr. Tribble:

Enclosed for filing are the original and fifteen copies of
McCaw Cellular Communications of Florida, Inc.'s Prehearing
Statement on the Issues in the above-referenced. Also enclosed is
a computer disk in WordPerfect 5.1 format with the document on it
titled "920260.phs."

Please acknowledge receipt of these documents by stamping the
extra copy of this letter "filed" and returning the same to me.

ACK 3 Thank you for your assistance with this filing.

AFA _____

APP _____

CAF _____

OML _____

CTR _____

ERG _____

FRS/amb

Enclosures

cc: 6 Parties of Record

Sincerely,



Floyd R. Self

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28
DIVISION OF RECORDS

DOCUMENT NUMBER-DATE

12986 DEC-6 93

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Comprehensive review of revenue requirements and rate stabilization plan of Southern Bell.)
)
) Docket No. 920260-TL
)
)

In Re: Investigation into the integrity of Southern Bell's repair service activities and reports.)
)
) Docket No. 910163-TL
)
)

In Re: Investigation into Southern Bell's compliance with Rule 25-4.110(2), F.A.C., Rebates.)
)
) Docket No. 910727-TL
)
)

In Re: Show cause proceeding against Southern Bell for misbilling customers.)
)
) Docket No. 900960-TL
)
)

In Re: Request by Broward Board of County Commissioners for extended area service between Ft. Lauderdale, Hollywood, North Dade and Miami.)
)
) Docket No. 911034-TL
)
)

Filed: December 6, 1993

**McCAW CELLULAR COMMUNICATIONS OF FLORIDA, INC.'S
PREHEARING STATEMENT OF THE ISSUES**

McCaw Cellular Communications of Florida, Inc. ("McCaw"), pursuant to Florida Public Service Commission ("Commission") Order No. PSC-93-1726-PCO-TL (issued December 1, 1993) and Florida Administrative Code Rule 25-22.038(3), respectfully submits the following Prehearing Statement positions in the above-captioned docket.

A. WITNESSES

McCaw will not sponsor a witness in this proceeding.

B. EXHIBITS

McCaw has not prefiled any exhibits in this proceeding. McCaw reserves its right to use exhibits for purposes of cross-

DOCUMENT NUMBER-DATE

12986 DEC-6 93

FPSC-RECORDS/REPORTING

examination in this proceeding.

C. BASIC POSITION

McCaw's interest in this proceeding is limited to only a few of the issues identified in the December 1, 1993 Additional Order on Prehearing Procedure. Specifically, McCaw's interest in this docket is limited to those issues pertaining to mobile interconnection rates (Issue 29), the review of the rate stabilization plan (Issues 25a and 25b), and the proposed continuation of the current form of regulation (Issue 26). If the Commission approves the petition and tariff now pending in Docket No. 930915-TL, then no further changes in the mobile interconnection rates are necessary in this docket. As for the incentive regulation issues, the currently effective incentive regulation plan has failed to provide identifiable, positive benefits. Alternative regulatory treatment may be appropriate for the competitive services provided Southern Bell fully complies with sections 364.338 and 364.3381.

D. ISSUES AND POSITIONS

McCaw presents the following positions on the issues of law, fact, and policy identified in this docket. For issues not identified below, McCaw's position is "No position at this time."

Issue 25a: What criteria should the Commission use to evaluate Southern Bell's performance under the current form of regulation.

McCaw's Position: The Commission is required to utilize the criteria and requirements specified in sections 364.036, 364.338, and 364.3381, Florida Statutes.

Issue 25b: Has the current incentive regulation plan under which Southern Bell has been operating achieved the goals as set forth in DN 880069-TL? What are the positive and negative results, if any?

McCaw's Position: No, and Southern Bell has not demonstrated any positive benefits or results as a consequence of the current plan.

Issue 26: Should the Commission continue the current form of regulation for SBT? If not, what is the appropriate form of regulation for SBT?

McCaw's Position: As a general matter, alternative regulatory treatment is unnecessary for monopoly services given the incentives inherent in traditional rate base, rate of return regulation, and the record in this case does not demonstrate any need for incentive regulation for Southern Bell. However, alternative regulatory treatment may be appropriate for competitive services provided Southern Bell fully complies with sections 364.338 and 364.3381.

Issue 29: Southern Bell has made the following proposals:

- A) To reduce the local transport element for both originating and terminating access from \$.01600 to \$.01289.
- B) To reduce the current FGD originating CCL from \$.02660 to \$.02600.
- C) To reduce the current FGD terminating CCL from \$.03660 to \$.02927.
- D) Not to flow through the switched access reductions to

mobile interconnection usage rates.

E) Not to make any changes to its toll services rates.

Should SBT's proposals be approved? If not, what actions should the Commission take with respect to SBT's switched access, toll, and/or mobile interconnection usage rates? What is the test year revenue impact?

McCaw's Position: With respect to mobile interconnection rates, if the Commission approves the petition and tariff in Docket No. 930915-TL, then no further changes to the mobile interconnection rates are necessary as a result of actions in this docket.

E. STIPULATIONS

McCaw is not aware of any stipulations between the parties to this proceeding.

F. PENDING MOTIONS

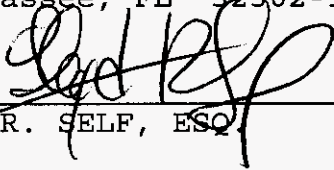
McCaw does not presently have any pending motions in this proceeding.

G. OTHER REQUIREMENTS

McCaw is unaware of any requirements of the procedural order with which the McCaw cannot comply.

Respectfully submitted this 6th day of December, 1993.

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FLOYD R. SELF, ESQ.

Attorneys for McCaw Cellular
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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing in Docket No. 920260-TL has been sent by Hand Delivery (*) and/or U.S. Mail on this December 6, 1993 to the following parties of record:

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