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ORIGINAL
FILE COPY

July 22, 1996

ACK _____ Ms. Blanca S. Bayo
VSA _____ Director, Division of Records and Reporting
APP _____ Florida Public Service Commission
CAF _____ 2540 Shumard Oak Boulevard
CAF _____ Betty Easley Conference Center, Rm. 110
CAF _____ Tallahassee, Florida 32399-0850

CAF _____ RE: Docket No. 930173-TL Polo Park EAS

EAC _____ Dear Ms. Bayo:

LEB 1 _____
LIR 3 _____ Enclosed please find an original and fifteen copies of
GIC _____ BellSouth Telecommunications Inc.'s Post Hearing Statement Of
GIC _____ Issues and Positions, which we ask that you file in the captioned
GIC _____ docket.

SFB 1 _____ A copy of this letter is enclosed. Please mark it to
WAC _____ indicate that the original was filed and return the copy to me.
WAC _____ Copies have been served to the parties shown on the attached
WAC _____ Certificate of Service.

Sincerely yours,

J. Phillip Carver
J. Phillip Carver (PW)

Enclosures

cc: All Parties of Record
R. G. Beatty
A. M. Lombardo
William J. Ellenberg II

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CERTIFICATE OF SERVICE
Docket No. 930173-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by U.S. Mail this 22nd day of July, 1996 to:

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J. Phillip Carver (JPC)
J. Phillip Carver

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by the residents)
of Polo Park requesting extended)
area service (EAS) between the)
Haines City exchange and the)
Orlando, West Kissimmee, Lake)
Buena Vista, Windermere, Reedy)
Creek, Winter park, Clermont,)
Winter Garden, and St. Cloud)
exchanges.)

Docket No. 930173-TL

Filed: July 22, 1996

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
POST HEARING STATEMENT OF ISSUES AND POSITIONS**

BellSouth Telecommunications, Inc. ("BellSouth or Company"), hereby files, pursuant to Rule 25-22.056(3), Florida Administrative Code, its Post Hearing statement of Issues and Positions and states the following:

BellSouth has taken no position on most of the issues in this docket for two reasons: 1) the only route at issue in this docket that involves a BellSouth exchange is Haines City to Orlando (Orlando is a BellSouth exchange); 2) because this route is interLATA, BellSouth has no data regarding the traffic over this route. Without traffic data, BellSouth is unable to determine whether a sufficient community of interest exists on this route to justify non-optional, flat rate extended area service. Accordingly, BellSouth has taken no position as to whether extended area service ("EAS") is appropriate.

DOCUMENT NUMBER-DATE

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BellSouth does believe, however, that if the Florida Public Service Commission ("Commission") determines that an alternative toll plan is appropriate, then the ECS plan is the best alternative. Further, customers should be surveyed regarding any plan that is proposed.

In addition to the foregoing, BellSouth states, pursuant to Rule 25-22.056(3)(a), the following as its specific positions on the issues that have been identified for resolution in this docket.

BELLSOUTH'S POSITION ON THE IDENTIFIED ISSUES

Issue 1: Is there a sufficient community of interest on the routes listed in Table A to justify surveying for nonoptional extended area service as currently defined in the Commission rules, or implementing an alternative interLATA toll plan?

Position: In the absence of traffic data, BellSouth can reach no conclusion as to whether a community of interest exists on the Haines City to Orlando route (the only BellSouth route at issue). If the Commission orders an alternative plan, BellSouth believes that the ECS Plan is the most appropriate.

Issue 2: What other community of interest factors should be considered in determining if either an optional or nonoptional toll alternative should be implemented on these routes?

Position: BellSouth has no position.

Issue 3: If a sufficient community of interest is found on any of these routes, what is the economic impact of each plan on the company (summarize in chart form and discuss in detail)?

- a) EAS with 25/25 plan and regrouping;
- b) Alternative InterLATA toll plan; and
- c) Other (specify)

Position: Each plan would have some economic impact on BellSouth because the company would have to incur costs to provide facilities to implement any plan. BellSouth does not, however, have the data necessary to quantify these costs.

Issue 4: Should subscribers be required to pay an additive as a prerequisite to surveying for extended area service or an alternative interLATA toll plan? If so, how much of a payment is required and how long should it last?

Position: BellSouth has no position.

Issue 5: If a sufficient community of interest is found, what are the appropriate rates and charges for the plan to be implemented on these routes?


Position: BellSouth has no position.

Issue 6: If extended area service or an alternative interLATA toll plan is determined to be appropriate, should the customers be surveyed?

Position: Yes. Customers should be surveyed regarding any proposed plan.

Respectfully submitted this 22nd day of July, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.


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