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November 21, 1996

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Case No. 920260-TP

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Citizens' Post-Hearing Statement of Issues and Positions. A diskette in WordPerfect 6.1 is also submitted.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck

Charles J. Beck
Deputy Public Counsel

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Comprehensive Review of the)
Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern) Filed: November 21, 1996
Bell Telephone & Telegraph Company)
_____)

CITIZENS' POSTHEARING STATEMENT OF ISSUES AND POSITIONS

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, file this posthearing statement of issues and positions.

Statement of Basic Position

* The Commission should set aside \$2 million per year of the unspecified rate reduction to address possible adverse effects resulting from mandatory area code changes. If the Commission applies some of the unspecified rate reductions to access charges, the Commission should require IXC's to flow through the reductions to their basic toll rates (MTS). *

Issues and positions

Issue 1. Below are listed the proposals of various interested parties to this proceeding with respect to the disposition of the scheduled 1996 unspecified rate reductions. Which, if any, should be approved?

Citizens' position: * The Commission should adopt the proposal by Mr. Garver and establish a reserve fund to assist customers of BellSouth Telecommunications, Inc., who experience problems with conversion to new area codes. *

Discussion: Customers who are assigned area codes having a 0 or 1 as a middle number are at risk of losing incoming calls from domestic PBX systems and international calling from systems that recognize only 3-digit area codes with 0 or 1 as the middle number. Thus, unless these old telecommunications systems are upgraded, a local business customer in an area code area having no 1 or 0 as the middle number is at risk of losing business. The impact on individual customers relates to the amount of incoming traffic the customer may receive from either domestic or international callers whose equipment is not compatible with the more recent numbering plans. Testimony of James A. Garver at 2.

In Order No. P.C.-95-1507-FOF-TL, the Commission ordered an interim relief plan in connection with the implementation of the 954 Area Code in Broward County. However, it was not until August 1, 1996 that incoming calls to Broward County customers were rejected when the dialing party used the old 305 area code prefix. It's far too early to determine the effectiveness of the measures adopted by the Commission in the above

referenced docket. In the meantime, it would be prudent for the Commission to establish a fund in the event the steps that have been taken by the Company and the Commission to date are not effective in solving the problem. By a simple review of the action plans of the Commission and the Company in Docket No. 951160-TL, it is very apparent that there was a real potential for severe economic harm to certain business customers as a result of the adoption of new area codes such as 954. It is far too early to declare that this potential is not real or that the problem has been resolved. Id.

Issue 2. To the extent the Commission does not approve the plans proposed by BellSouth, Public Counsel, FCTA, Palm Beach Newspapers, Inc./Florida Today and AT&T, MCI, Spring, FIXCA, Ad Hoc and McCaw, how should the Commission implement the scheduled rate reduction?


Citizens' position: • If the Commission applies some of the unspecified rate reductions to access charges, the Commission should require IXC's to flow through the reductions to their basic toll rates (MTS). To the extent the Commission does not adopt any of the proposals, the Commission should reduce local rates. •

Issue 3. What should be the effective dates of the approved tariffs?

Citizens' position: * The tariffs should be effective as soon as possible. *

Respectfully submitted,

JACK SHREVE
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Attorneys for the Citizens
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 21st day of November, 1996.

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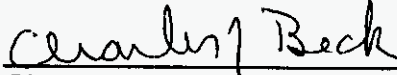
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