

Marcell Morrell** Vice President & General Counsel - Florida

Associate General Counsel Anthony P. Gillman** Leslie Reicin Stein*

Attorneys* Kimberly Cp well M. Eric Edgington Ernesto Mayor, Jr.

July 18, 1997

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

Re: Docket No. 970172-TP Docket No. 970173-TP Docket No. 970281-TL

/	Dear Ms. Bayo:	
ACK AFA APP	Please find enclosed an original and fifteen Prehearing Statement for filing in the above copy of the Prehearing Statement in WordPress indicated on the Certificate of Service. If matter, please contact me at (813) 483-2615	matters. Also enclosed is a diskette with a erfect 6 1 format. Service has been made there are any questions regarding this
CTR		
LEG 3	- Cutruez (SIL) Anthony P. Gillman	
OPC	APG:tas	
SECL WAS	Enclosures	DOCUMENT WATER DATE
OTH 140	ach	0.7010 111 10.5

GTE Telephone Operations

One Tampa City Center 201 North Franklin Street, FLTC0007 Post Office Box 110 Tampa, Florida 33601 813-483-2606 813-204-8870 (Facsimile)

97248 JUL 185

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DRIGINAL FILE CONT

In re: Petition by MCI Telecommunications
Corporation for an order requiring BellSouth
Telecommunications, Inc. to remove its
deregulated payphone investment and
associated expenses from its intrastate
operations and reduce the Carrier Common
Line rate element of its intrastate switched
accer a charges by approximately \$36.5
million as required by the Federal
Telecommunications Act of 1996

Docket No. 970172-TP

Filed: July 18, 1997

In re: Petition by MCI Telecommunications
Corporation for an order requiring GTE Florida
Incorporated to remove its deregulated
payphone investment and associated
expenses from its intrastate operations and
reduce the Carrier Common Line rate element
of its intrastate switched access charges by
approximately \$9.6 million as required by the
Federal Telecommunications Act of 1996

Docket No. 970173-TP

In re: Establishment of intrastate implementation requirement governing federally mandated deregulation of local exchange company payphones Docket No. 970281-TL

GTE FLORIDA INCORPORATED'S PREHEARING STATEMENT

GTE Florida Incorporated (GTEFL) files its Prehearing Statement in accordance with the Commission's Rule 25-22.038(3) and its Order number PSC-97-0721-PCO-TP.

A. Witnesses

GTEFL's witnesses and the issues to which they will testify are as follows:

- 1. Steven A. Olson: Issue 1.
- Charles M. Scobie: Issues 2-5.

B. Exhibits

GTEFL intends to introduce Exhibit SO-1, attached to Mr. Olson's Direct Testimony.

GTEFL reserves the right to introduce additional exhibits before and during the hearing.

C. GTEFL's Basic Position

Jection 276(B)(1)(b) of the Telecommunications Act of 1996 requires incumbent LECs to remove any subsidies provided to their payphone operations by basic and exchange access revenues. The present docket has been opened to address the specific question of whether the payphone operations of Florida LECs are being subsidized. In order to determine whether a subsidy exists, the costs of a company's payphone operations must be compared with its payphone revenues. If the revenues exceed the costs, no subsidy exists.

The annual revenue associated with GTEFL's intrastate pay telephone operations for 1995 is \$20,873,637 and the total annual intrastate costs incurred to provide payphone service in the same year was \$16,776,835. Because GTEFL's intrastate payphone revenue exceeds its intrastate payphone costs, no subsidy exists with respect to GTEFL.

D., E., F. GTEFL's Specific Positions

GTEFL considers all of the issues in this proceeding to be mixed questions of fact, law, and policy. Its positions on the specific issues follow.

Issue 1: What is the amount of intrastate payphone subsidy, if any, that needs to be eliminated by each local exchange company pursuant to Section 276(B)(1)(b) of the Telecommunications Act of 1996?

GTEFL's Position: GTEFL does not have an intrastate payphone subsidy in Florida. The annual revenue associated with GTEFL's intrastate pay telephone operations for 1995 was \$20,873,637 and the total annual intrastate costs incurred to provide this service was \$16,776,835. Because GTEFL's intrastate payphone revenue exceeds its intrastate payphone costs, no subsidy exists with respect to GTEFL.

Issue 2: If an intrastate payphone subsidy is identified in Issue 1, do the FCC's Payphone Reclassification Orders require the Florida Public Service Commission to specify which rate element(s) should be reduced to eliminate such subsidy?

GTEFL's Position: GTEFL's intrastate rates do not contain any subsidy amount.

As such, this issue does not pertain to GTEFL. However, if there had been a subsidy,

GTEFL's position would be that the FCC's Payphone Reclassification Orders do not
require the Commission to specify which rate elements should be reduced to eliminate
such subsidy.

Issue 3: If an intrastate payphone subsidy is identified in Issue 1, what is the appropriate rate element(s) to be reduced to eliminate such subsidy?

GTEFL's Position: GTEFL's intrastate rates do not contain any subsidy amount.

As such, this issue does not pertain to GTEFL. However, if there had been a subsidy,

GTEFL would have proposed reducing the intrastate Carrier Common Line (CCL) charge

or the Residual Interconnection Charge (RIC).

Issue 4: If necessary, by what date should revised intrastate tariffs that eliminate any identified intrastate payphone subsidy be filed?

GTEFL's Position: GTEFL's intrastate rates do not contain any subsidy amount.

As such, this issue does not pertain to GTEFL. However, if there had been a subsidy,

GTEFL's position would have been that any tariff filings for the removal of such subsidy should be made within 30 days of the issuance of the final order in this docket.

Issue 5: Is April 15, 1997, the appropriate effective date for revised intrastate tariffs that eliminate any identified intrastate payphone subsidy?

GTEFL's Position: GTEFL's intrastate rates do not contain any subsidy amount.

As such, this issue does not pertain to GTEFL. However, if there had been a subsidy, GTEFL's position would have been that April 15, 1997 is the appropriate effective date for revised intrastate tariffs to eliminate any such intrastate payphone subsidy.

Issue 6: Should these dockets be closed?

GTEFL's Position: Yes.

G. Stipulated Issues

No issues have been stipulated.

H. Pending Matters

There are no pending matters involving GTEFL at this time.

I. Compliance Statement

GTEFL can, to the best of its knowledge, comply with all requirements set forth in the Commission's Order Establishing Procedure in this case.

Respectfully submitted on July 18, 1997.

Anthony P. Gillman Kimberly Caswell Post Office Box 110, FLTC0007 Tampa, Florida 33601

Telephone: 813-483-2615

Attorneys for GTE Florida Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Prehearing Statement in Docket Nos. 970172-TP, 970173-TP and 970281-TL were sent via overnight delivery on July 17, 1997, to the parties on the attached list.

Anthony Gillman

Will Cox/Martha Brown Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Robert Beatty/Nancy White c/o Nancy Sims
BellSouth Telecomm. Inc.
150 S. Monroe St., Room 400
Tallahassee, FL 32301

Lynn B. Hall
Vista-United Tel. Co.
3100 Bonnet Creek Road
Lake Buena Vista, FL 32830

Angela B. Green Florida Pub. Telecomm. Assn. 125 S. Gadsden St., Suite 200 Tallahassee, FL 32301 Harriet Eudy ALLTEL Florida, Inc. 206 White Avenue, S.E. Live Oak, FL 32060 Laurie A. Maffett Frontier Comm. of the South 180 S. Clinton Avenue Rochester, NY 14646-0400

Richard D. Melson Hopping Green Sams & Smith 123 S. Calhoun Street Tallahassee, FL 32314 John H. Vaughan St. Joseph Tel. & Tel.Co. 502 Fifth Street Port St. Joe, FL 32456 Tom McCabe Quincy Telephone Co. 107 W. Franklin Street Quincy, FL 32351

Lynn Brewer Northeast Fla.Tel.Co.Inc. 130 N. Fourth Street Macclenny, FL 32063 Robert M. Post, Jr. Indiantown Tel. Sys. Inc. 15925 S.W. Warfield Blvd. Indiantown, FL 34956 Bill Thomas Gulf Tel. Co. 115 W. Drew Street Perry, FL 32347

Ferrin Seay Florala Tel. Co. Inc. 522 North 5th Street Florala, AL 36442 Charles J. Rehwinkel Sprint-Florida, Inc. 1313 Blair Stone Road, MC 2565 Tallahassee, FL 32302 Michael J. Henry MCI Telecomm. Corp. 780 Johnson Ferry Road Suite 700 Atlanta, GA 30342

Tracy Hatch AT&T 101 N. Monroe Street Suite 700 Tallahassee, FL 32301