BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Establishment of intrastate implementation requirements governing federally mandated deregulation of loc exchange company payphones		Docket No. 970281-TL
In re: Petition by MCI Telecommuni- cations Corporation re BellSouth)	Docket No. 970172-TP
Telecommunications, Inc.	Ś	
In re: Petition by MCI Telecommuni-)	Docket No. 970173-TP
cations Corporation re GTE Florida)	
Incorporated)	
	_	Dated: July 17, 1997

PREHEARING STATEMENT OF OUINCY TELEPHONE COMPANY

Quincy Telephone Company files this Prehearing Statement, pursuant to Order No. PSC-97-0721-PCO-TP:

- (a) No witnesses will be called.
- (b) No exhibits will be filed.
- (c) The company's basic position is that it is unnecessary for the company to reduce
 any rates or charges as a result of removal of deregulated payphone investment and
 associated expenses from intrastate operations and that no factual issue regarding
 such reduction has been properly and lawfully raised in this docket. Quincy
 Telephone Company's position is that no intraLATA subsidy exists. Quincy
 Telephone Company's payphone rates were established in a rate of return, residual
 ratemaking environment. The rates established by the Florida Public Service

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- Commission were not cost-based when established and were never established to ensure recovery of cost on a service-by-service basis.
- (d) Quincy Telephone Company considers that there are no questions of fact at issue regarding Quincy Telephone Company since the hearing is a result of a Petition on PAA which was the result of Petitions by MCI that did not mention and did not involve Quincy Telephone Company by asking for removal of deregulated payphone investment and associated expenses from intrastate operations or by asking for reduction of any rates or charges made by Quincy Telephone Company to MCI.
- (e) Quincy Telephone Company considers that the questions of law at issue are as follows:
 - (1) Is it proper and lawful to expand the Petition on PAA filed by MCI into a generic proceeding?
 - (2) Should Quincy Telephone Company be dismissed from this proceeding?
 - (3) Are the tariffs filed by Quincy Telephone Company reclassifying pay telephone investment presumptively valid?
- (f) Quincy Telephone Company has no position on which policy questions are at issue.
- (g) Quincy Telephone Company has not stipulated any issues.
- (h) Quincy Telephone Company does not have any pending motions, although other parties may have.
- (i) Quincy Tele, hone Company is not aware of any requirement of Order No. PSC-

- 97-0721-PCO-TP with which it cannot comply, although the Quincy Telephone

 Company should not be a party in this docket.
- (j) Quincy Telephone Company's position with regard to each issue on the "List of Issues" attached to Order No. PSC-97-072I-PCO-TP is as follows:
- ISSUE: 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?
 POSITION: None. There is no intrastate payphone subsidy.
- 2. ISSUE: If an intrastate payphone subsidy is identified in Issue 1, do the FCCs Payphone Reclassification Orders require the Florida Public Service Commission to specify which rate element(s) should be reduced to eliminate such subsidy? POSITION: No, but if the FCC's orders require PSC action, this docket is not the proper one in which to act with regard to Quincy Telephone Company.
- 3. ISSUE: If an intrastate payphone subsidy is identified in Issue 1, what is the appropriate rate element(s) to be reduced to eliminate such subsidy?
 POSITION: Whatever the Quincy Telephone Company elects.
- 4. ISSUE: If necessary, by what date should revised intrastate tariffs that eliminate any identified intrastate payphone subsidy be filed?
 POSITION: No position.
- 5. ISSUE: Is April 15, 1997, the appropriate effective date for revised intrastate tariffs that eliminate any identified intrastate payphone subsidy? POSITION: Yes, Quincy Telephone Company has filed the appropriate tariff,

which was approved and made effective on April 15, 1997, and no party has contested the tariff or alleged that there were any subsidies that needed to be removed.

6 ISSUE: Should these dockets be closed?

POSITION: Yes, with regard to Quincy Telephone Company.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Prehearing Statement of Quincy Telephone Company has been furnished by U.S. Mail or by hand delivery this 17th day of July, 1997 to the following:

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