ORIGINAL

ATTORNEYS AND COUNSELORS AT LAW

P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
18501 224-9115 FAX 18501 222-7560

October 23, 1997

HAND DELIVERED

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

Re: Establishment of eligible telecommunications carriers pursuant to Section 214(e) of the Telecommunications Act of 1996.

Implementation of changes in the Federal Lifeline Assistance Plan currently provided by telecommunications carriers of last resort.

FPSC Docket No. 970714-TP

Dear Ms. Bayo:

	m
	Enclosed for filing in the above docket are the original and
	fifteen (15) copies of ALLTEL Florida, Inc.'s, Northeast Florida
	The state of the s
	Telephone Company's and Vista-United Telecommunications Company's
	Request for Waiver of Toll Limitation Requirement and Motion for
ACK	A Regulation of the Principle of the Pri
	Extension of Time to File Implementation Plans.
4FA	
W	
AEP.	Please acknowledge receipt and filing of the above by stamping
92.12	the duplicate copy of this letter and returning same to this
	the duplicate copy of this feet and feet and
0.1	writer.

Thank you for your assistance in connection with this matter.

J. Jeffry Wahlen

JJW/pp

EnclosuresRECTIVES & ILEL

EPSO BUREAU OF RECOMES

DOCUMENT NUMBER - DATE

10966 OCT 23 5

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Establishment of eligible telecommunications carriers pursuant to Section 214(e) of the Telecommunications Act of 1996.

In re: Implementation of changes in the Federal Lifeline Assistance | Plan currently provided by telecommunications carriers of last resort.

DOCKET NO. 970744-TP FILED: October 23, 1997

REQUEST FOR WAIVER OF TOLL LIMITATION REQUIREMENT AND MOTION FOR EXTENSION OF TIME TO FILE IMPLEMENTATION PLANS

Pursuant to Order No. PSC-97-1261-FOF-TP, and Rule 25-22.037(2), F.A.C., ALLTEL Florida, Inc. ("ALLTEL"), Northeast Florida Telephone Company ("Northeast") and Vista-United Telecommunications ("Vista") file the following Request for Waiver and Motion for Extension of Time to file toll limitation implementation plans, and say:

- 1. Pursuant to Order No. PSC-97-1262-FOF-TP, issued on October 14, 1997 ("Order"), local exchange companies designated as ETCs that are unable to provide full toll limitation services at this time should file implementation plans and a request for waiver with the Commission by October 23, 1997.
- 2. ALLTEL, Northeast and Vista are designated in the Order as ETCs. As noted in the Order, toll limitation services can be provided only in certain areas of the state. Moreover, most carriers can provide toll blocking, but not toll control.

10966 OCT 23 F

For reasons relating to the configuration of their switches, and uncertainty regarding the steps necessary to implement full toll limitation services, including toll control, ALLTEL, Northeast and Vista are unable to provide full toll limitation services at this time. Accordingly, those companies initial waiver of twelve months for hereby request an implementation of full toll limitation services in their respective In support of this request, the three service territories. companies allege that toll control functionality is not generally available from their switch vendors at this time. In addition, ALLTEL, Northeast and Vista request a ten-4. day extension of time to file implementation plans for full toll

- 4. In addition, ALLTEL, Northeast and Vista request a tenday extension of time to file implementation plans for full toll limitation services. The requested extension of time will give the companies more time to prepare meaningful implementation plans based on information from switch vendors regarding the expected availability dates for the toll control functionality. In light of the FCC's timetable, this request for extension of time, if granted, will not prejudice any interested persons or the ability of the Florida Public Service Commission to cooperate with the FCC on matters relating to full toll limitation services.
- 5. All pleadings, notices, orders and other papers filed or served relating to this request should be served on ALLTEL, Northeast and Vista at the following addresses:

Lee L. Willis J. Jeffry Wahlen Ausley & McMullen P. O. Box 391 Tallahassee, FL 32302 Harriet Eudy ALLTEL Florida, Inc. P. O. Box 550 Live Oak, FL 32060

Lynn B. Hall Vista-United Telecommunications P. O. Box 10180 Lake Buena Vista, FL 32830 requested are set forth above.

Lynne Brewer Northeast P.O. Box 485 Macclenny, FL 32063-0485

ALLTEL, Northeast and Vista will be substantially affected by the Commission's decision on this request because its decision will determine whether they will get the requested waiver. The ultimate facts alleged that entitle the companies to the relief

WHEREFORE, ALLTEL, Northeast and Vista request that the Public Service Commission grant an waiver of the requirement to provide full toll limitation services for an initial period of twelve months and request that the Commission extend the time for filing implementation plans for an additional ten days.

DATED this 230 day of October, 1997.

Respectfully submitted,

J. JEFFRE WAHLEN LEE L. WILLIS Ausley & MoMullen Post Office Box 391 Tallahassee, FL 32302 (850) 224-9115

ATTORNEYS FOR ALLTEL, NORTHEAST AND VISTA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Request for Waiver and Motion for Extension of Time, filed on behalf of ALLTEL, Northeast and Vista, has been served by U. S. Mail or hand delivery (*) on this 130 day of October, 1997 to the following:

Mr. Will Cox*
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

ATTORNEY