



ORIGINAL

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

January 15, 1998

Re: Docket No. [REDACTED]
Joint Petition of Robert A. Butterworth, Attorney General, and the Citizens of the State of Florida, by and through the Office of Public Counsel, for initiation of formal proceedings pursuant to Section 120.57(1), Florida Statutes, to investigate the practice of "slamming," i.e. the unauthorized change of a customer's presubscribed carrier, and to determine the appropriate remedial measures

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of GTE Florida Incorporated's Prehearing Statement for filing in the above matter. Also enclosed are an original and fifteen copies of the Rebuttal Testimony of Charles M. Scobie on behalf of GTE Florida Incorporated. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at (813) 483-2617.

Very truly yours,

Kimberly Caswell

RC:tas

Enclosures

- ACK _____
- BEA _____
- APR 2
- CAF 2
- CMH 2
- CTR _____
- EAC _____
- ECR _____
- LJA 5
- QIC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

PH Statement
DOCUMENT NUMBER-SAFE
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FFSC-RECORDS/REPORTING

testimony
DOCUMENT NUMBER-SAFE
[REDACTED]
FFSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Rule 25-24.845, F.A.C.,)
Customer Relations; Rules Incorporated)
and Proposed Amendments to Rule 25-4.118,)
F.A.C., Interexchange Carrier Selection;)
Rule 25-24.490, F.A.C., Customer Relations;)
Rules Incorporated)
_____)

Docket No. 970882-T1
Filed: January 15, 1998

GTE FLORIDA INCORPORATED'S PREHEARING STATEMENT

GTE Florida Incorporated (GTEFL) hereby files its Prehearing Statement in this matter.

Witnesses

GTEFL's witness in this proceeding will be Charles M. Scobie.

Exhibits

GTEFL does not now plan to introduce any exhibits, but reserves the right to do so at appropriate points before and during the hearing.

GTEFL's Position

GTEFL believes more vigilant use of existing Commission sanctions—including substantial fines and certificate revocation—will be the best way to curb slamming, which is caused, for the most part, by a very small group of bad actors. It is much more efficient and effective to better use existing mechanisms directed to the core of the problem than to impose complex and costly regulations on all companies in the industry. The Commission should keep in mind that slamming complaints are a very small percentage

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of total primary interexchange carrier (PIC) changes. It is, moreover, unrealistic to expect complete eradication of the slamming problem and unreasonable to propose rules based on this goal. The Commission should keep in mind that the expense of system changes and other activities associated with any new rules will ultimately be passed on to the customer. The public interest in this case demands a balancing of these costs against the potential benefits of the proposed rules. GTEFL believes that, in this case, the detriments of the recommended rules outweigh their benefits. GTEFL believes that there should be a consistent set of federal and state rules relative to slamming. If states establish different requirements, consumers would face potentially confusing state-specific rules and national and regional carriers, including multi-state ILECs, would face costly administrative processes in dealing with different sets of state rules. The economic costs of these rules will ultimately be borne by consumers.

GTEFL opposes the rule changes in general, but will comment here on a few sections that are particularly troublesome:

25-4.110(10). This section would require all bills to display the certificate number of each company that provided service. GTEFL opposes this requirement, because the certificate number means nothing to the customer and would only add confusing information to the bill.

25-4.110(11)a.3. This section would require a "free billing block" option from the LEC. GTEFL does not today have the capability of providing such a billing block, and believes the expense of doing so would not justify any small benefits that might be gained.

25-4.110(12). This section would require the customer to be notified on his first bill that a PIC freeze is available. GTEFL's current system is unable to perform such notification and believes the expense of system changes would not justify potential benefits.

25-4.110(13). This section would require the LEC to print on the first or second page of the bill when his provider of local, local toll, or toll service has changed. Again, this notification is not possible today. GTEFL believes that the information provided today is adequate.

Stipulated Issues

No issues have been stipulated.

Pending Matters

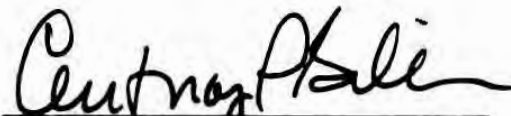
There are no pending matters involving GTEFL at this time.

Compliance Statement

GTEFL can, to the best of its knowledge, comply with all procedural requirements established for this case.

Respectfully submitted on January 15, 1998.

By:



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