



Northeast Florida Telephone Company, Inc.

A Company of NEFCOM, Inc.

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April 21, 1999
(VIA OVERNIGHT MAIL)

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TALLAHASSEE, FL

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

Re: IntraLATA Toll Dialing Parity; undocketed

Dear Ms. Bayo:

On March 23, 1999, the Federal Communications Commission ("FCC") issued an Order in CC Docket 96-98 (In re: Implementation of the Local Competition Provisions of the Telecommunications Act of 1996) [hereinafter "FCC Order"]. Therein, the FCC set forth certain revised dates for the implementation of toll dialing parity plans. Footnote 20 of the FCC Order indicates that the State of Florida has already implemented intraLATA toll dialing parity.

The Florida Public Service Commission ("FPSC" or the "Commission") has issued three general orders relating to intraLATA dialing parity: Order No. PSC-95-0203-FOF-TP, issued February 13, 1995 (Dkt. No. 939330-TP); Order No. PSC-97-0709-FOF-TP, issued June 13, 1997 (Dkt. No. 970526-TP) and PSC-98-0710-FOF-TP, issued May 22, 1998 (Dkt. No. 970526-TP). These orders appear to form the basis for Footnote 20 in the FCC Order and reflect the State of Florida's plan for intraLATA toll dialing parity. Thus, in accordance with the FCC Order, it appears that the State of Florida has adopted an intraLATA toll dialing parity plan before May 7, 1999 and that the plan articulated in that Order is being implemented.

To the extent the FCC Order requires Northeast Florida Telephone Company, Inc. ("Northeast") to submit a plan to the FPSC at this time, Northeast submits that its plan is to implement toll dialing parity in accordance with the FPSC orders listed above, that it has implemented the plan articulated in the three orders and that it stands ready to offer intraLATA toll dialing parity on a bona fide request, negotiated basis as set forth in the three FPSC's orders.

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FPSC-RECORDS/REPORTING

Northeast is in receipt of a bona fide request for intraLATA toll dialing parity and intends to offer intraLATA 1+ presubscription within its service territory by October 1, 1999. Northeast just recently completed deployment of a new digital switch in its host central office and has activated the Multi-PIC software in the switch. This is the first step toward implementing intraLATA presubscription on a full 2-PIC basis. Northeast is now in the process of conducting testing, implementing billing changes, and preparing training material and carrier notification letters.

Please let me know if the Commission needs any additional information from Northeast on this subject. I can be reached at (904) 259-0639.

Sincerely,



Deborah L. Nobles
Director of Revenue Requirement
& Regulatory Affairs

cc: Walter D'Haeseleer
Laura King