BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request by Escambia Board of County Commissioners for Extended Area Service between all Escambia County Communities	)	DOCKET NO. 871268-TL
In re: Intrastate access charges	)	DOCKET NO. 820537-TP
In re: Petitions of SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY for rate stabilization and implementation orders and other relief	)	DOCKET NO. 880069-TL ORDER NO. 21986 ISSUED: 10-3-89

The following Commissioners participated in the disposition of this matter:

BETTY EASLEY
JOHN T. HERNDON

Upon proper notice, a public hearing was held in the above-referenced docket on May 23, 1989, at the Ernest Ward High School Gymnasium, 7650 Highway 97, Walnut Hill, Florida, 32568.

APPEARANCES:

DAVID B. ERWIN, Esquire, Mason, Erwin and Horton, P.A., 1020 East Lafayette Street, Suite 202, Tallahassee, Florida 32301, on behalf of Southland Telephone Company.

E. BARLOW KEENER, Esquire, and DAVID M. FALGOUST, Esquire, c/o Marshall M. Criser, III, Suite 400, 150 South Monroe Street, Tallahassee, Florida 32301, on behalf of Southern Bell Telephone and Telegraph Company.

MICHAEL W. TYE, Esquire, 315 South Calhoun Street, Suite 505, Tallahassee, Florida 32301, on behalf of AT&T Communications of the Southern States, Inc.

JOHN R. MARKS, III, Esquire, and WILLIAM FURLOW, III, Esquire, Katz, Kutter, Haigler, Alderman, Eaton, Davis and Marks, P.A., Post Office Box 1877, Tallahassee, Florida 32302-1877, on behalf of Escambia County.

JACK SHREVE, Esquire, and CHARLES BECK, Esquire, Office of the Public Counsel, c/o Florida House of Representatives, The Capitol, Tallahassee, Florida 32399-1300, on behalf of the Citizens of the State of Florida.

TRACY HATCH, Esquire, and ANGELA B. GREEN, Esquire, Florida Public Service Commission, 101 East Gaines Street, Tallahassee, Florida 32399-0850, on behalf of Commission Staff.

PRENTICE P. PRUITT, Esquire, Florida Public Service Commission, 101 East Gaines Street, Tallahassee, Florida 32399-0850, on behalf of the Commissioners.

FINAL ORDER

BY THE COMMISSION:

I. BACKGROUND

This docket was initiated upon a request for countywide Extended Area Service (EAS) filed by the Escambia Board of County Commissioners on December 1, 1987. The request for countywide EAS involves the following exchanges: Pensacola, Cantonment, Molino, Walnut Hill, Davisville and Century. These exchanges are served by either Southland Telephone Company (Southland) or Southern Bell Telephone and Telegraph Company (Southern Bell), both of which are subject to regulation by this Commission pursuant to Chapter 364, Florida Statutes.

In addition to involving intercompany routes, this request also involves interLATA (Local Access Transport Area) routes. Southern Bell's Century exchange and Southland's Davisville and Walnut Hill exchanges are located in the Mobile, Alabama LATA. The remaining exchanges, consisting of Southern Bell's Pensacola and Cantonment exchanges, and Southland's Molino exchange, are located in the Pensacola, Florida LATA.

Order No. 18615, issued December 29, 1987, directed Southern Bell and Southland to complete traffic studies on the affected routes. A subsequent order, Order No. 19000, issued March 21, 1988, granted the companies an extension of time to complete and submit the traffic data, due to the complexities

inherent in completing an interLATA traffic study. Additionally, the Prehearing Officer granted both companies' request that the results of their traffic studies be afforded confidential treatment. The Prehearing Officer ruled the traffic data confidential on the basis that the disclosure of the traffic volume on the interLATA routes would aid competitors to the detriment of the long distance carriers which currently provide service on the affected routes. Three orders were issued which granted specified confidential treatment to the traffic data along the interLATA routes in this docket: Order No. 19769, issued August 8, 1988 (Southland data); Order No. 19978, issued September 12, 1988 (Southland data); and Order No. 20057, issued September 23, 1988 (Southern Bell data).

By Order No. 20605, issued January 17, 1989, we proposed granting countywide EAS in Escambia County upon terms specified within the Order. On February 2, 1989, before the proposed agency action became final, Southland filed its Petition protesting the action we proposed in Order No. 20605.

On March 23, 1989, an Issue Identification Meeting was held to define the issues to be addressed at the hearing. On March 31, 1989, an order on Prehearing Procedure, Order No. 20970, was issued. This Order identified the issues to be addressed in the hearing scheduled for May 23, 1989, and set out a time frame to be followed by the parties for key activities in the proceeding. Among other things, this Order directed the parties to file direct testimony by April 24, 1989, rebuttal testimony by May 1, 1989, and prehearing statements by May 1, 1989.

On April 12, 1989, Southern Bell filed a Motion for Extension of Time seeking additional time in which to submit its prefiled testimony. Southern Bell asserted that such an extension of time was necessary in order to complete an accurate and proper economic study and updated traffic studies, both of which Southern Bell considered essential to its testimony in this docket. In support of its request for additional time, Southern Bell cited Rule 25-4.060(1), Florida Administrative Code, which allows a company up to sixty (60) days to complete traffic studies, and Rule 25-4.061(2), Florida Administrative Code, which provides up to ninety (90) days for completing an economic impact study.

By Order No. 21214, issued May 9, 1989, we granted Southern Bell's Motion of Extension of Time. Southern Bell was granted sixty (60) days to complete and submit current traffic studies and ninety (90) days to complete and submit an updated economic impact analysis, with both of these time limits measured from March 31, 1989, the issuance date of the Order on Prehearing Procedure.

Meanwhile, on April 24, 1989, Southland filed its direct testimony of Thomas E. Wolfe, along with a request for confidential treatment of portions of the exhibits identified in the filing as exhibits TW-1, TW-2, and TW-4. On April 24, 1989, Southern Bell filed its direct testimony of Edna F. Bailey, Sandy E. Sanders and Ann M. Barkley. This Southern Bell testimony was annotated to indicate that it was based upon the most recent data then available and would be updated at such time as the updated traffic studies and economic impact analysis became available. No request for confidentiality accompanied the Southern Bell filing.

On May 2, 1989, Southern Bell filed a request for confidential treatment for certain information included in the direct testimony of Sandy E. Sanders previously filed on April 24, 1989, and identified in that filing as exhibits 2, 3, and 4. Southern Bell also requested that the original Sanders filing of April 24th be returned to counsel for the company and that the Commission substitute the May 2nd filing in its place.

On May 10, 1989, the Prehearing Conference was held. The Prehearing Officer denied Southland's April 24, 1989, request for confidentiality. However, the confidential status of portions of Southland's filing was ordered to be preserved while AT&T Communications of the Southern States, Inc. (AT&T) was given an opportunity to file its own confidentiality request for the Southland data. Additionally, the Prehearing Officer deferred ruling on Southern Bell's May 2, 1989, confidentiality request, pending the filing of briefs by the parties on the legal issues raised by Southern Bell's request. Confidential treatment would be afforded the Southern Bell data in the interim. May 19, 1989, was established as the deadline for submitting the above-referenced filings. Also at the Prehearing Conference it was determined that the updated traffic study and updated economic impact analysis to be filed by Southern Bell would not be available until after the hearing scheduled for May 23, 1989. Although not required to do so,

counsel for Escambia County stated on the record that he was specifically reserving the right to object to these late-filed exhibits, including the right to cross examine those who prepared the exhibits. These decisions, as well as the procedures to govern the hearing, were reflected in Order No. 21237, issued May 10, 1989.

The Hearing in this matter was held on May 23, 1989, in Walnut Hill, Florida. By that time, the briefs on confidentiality requested during the Prehearing Conference had been filed by the appropriate parties. The Hearing Panel declined ruling on the confidentiality requests of Southern Bell, Southland, and AT&T during the Hearing, but did rule the confidential status of the data was to be preserved in the interim.

On June 7, 1989, a Motion Hearing was held for the limited purpose of considering the confidentiality issues in this docket. As a result of that Hearing, we issued Order No. 21484 on June 29, 1989, which granted confidential status to the interLATA traffic data filed by both Southern Bell and Southland in this docket. The Prehearing Officer ruled that existing Orders No. 19769, 19978 and 20057 were broad enough by their terms to encompass the updated versions of the same data filed and due to be filed by both Southern Bell and Southland.

Southern Bell filed its updated traffic study data on May 30, 1989, and its updated economic impact study on June 29, 1989.

On July 11, 1989, Escambia County filed a Motion for Extension of Time requesting additional time in which to file its post-hearing brief in this docket. As grounds for its request, Escambia County cited the importance of the traffic studies and the economic impact data in this docket, along with Escambia County's desire to cross examine the individuals who prepared both of these documents. Additionally, Escambia County noted that it did not receive its copy of Southern Bell's economic impact filing until July 3, 1989, and thereafter, did not receive protective agreements and confidential data until July 10, 1989, although briefs of the parties were scheduled to be filed on or before July 14, 1989. Escambia County asserted that it would be difficult, if not

impossible, to conduct discovery and file a brief under such time constraints. Counsel for Escambia County represented that none of the parties had any objection to granting a reasonable extension of time. By Order No. 21588, issued July 20, 1989, the Prehearing Officer granted Escambia County's Motion and established August 4, 1989, as the new deadline for filing briefs in this docket.

On August 4, 1989, Southern Bell filed its post-hearing brief, along with a request for confidential treatment of portions of the brief. By Order No. 21737, issued August 16, 1989, the Prehearing Officer granted Southern Bell's request for confidentiality.

At the hearing in Walnut Hill the testimony of subscribers concerning their toll calling needs was heard, after which the companies presented their witnesses and testimony. Based upon the evidence received, it is our decision to require Southland and Southern Bell to survey the Century, Molino and Walnut Hill subscribers (all of whom would experience a rate increase) for implementation of a nonoptional, flat-rate, two-way countywide calling plan as described below. We note additionally that after this matter was docketed, but prior to the hearing, Southland merged the Davisville exchange into the Walnut Hill exchange.

II. DISCUSSION

CALLING PLAN

A major issue in this proceeding has been whether or not a sufficient community of interest exists along the toll routes in Escambia County to justify implementation of countywide EAS. Rule 25-4.060, Florida Administrative Code, provides:

> (2) A preliminary showing that a sufficient degree of community of interest between exchanges, sufficient to warrant further proceedings, will be considered to exist when the combined two-way calling rate over each inter-exchange route under consideration equals or exceeds two (2) messages per main and equivalent main station per month (M/M/M)

> and fifty (50%) percent or more of the subscribers in the exchanges involved make calls per month, except that:
>
> (a) On any given route between two exchanges, when the petitioning exchange has less than half the number of main and equivalent main stations as the larger exchange, studies of oneway traffic originating in the smaller exchange may be used, in which case the community of interest qualification will require a calling rate three (3) or more M/M/M with at least fifty (50%) percent of the exchanges subscribers making two (2) or more calls per month.

Pursuant to this Rule, it would appear that only two routes, Century to Pensacola and Walnut Hill to Pensacola, have calling rates meeting the Rule requirement. All the other routes in Escambia County that do not presently have EAS have calling rates below the Rule requirement.

Southland and Southern Bell do not believe countywide EAS should be implemented in Escambia County since all the routes do not meet the requirements of Rule 25-4.060. In most cases, we would probably agree. However, here we believe there are mitigating factors that justify implementation of countywide EAS. Century and Walnut Hill, as well as Molino and Cantonment, are all dependent upon Pensacola for employment, higher education, county offices, medical and emergency (911) services, and cultural and social events. Escambia County and the Citizens believe there is a sufficient community of interest between all exchanges in Escambia County to warrant countywide EAS. We agree. We do not believe nonqualifying intermediate routes to smaller communities should negate the request for countywide EAS in a situation like the one here, where all the smaller exchanges are dependent upon the larger exchange (Pensacola) for many of their services. We wish to emphasize that our policy has been and will continue to be not to permit "leap-frogging" or skipping of exchanges in an EAS request.

We have considered the feasibility of a wide variety of different calling plans in reaching our decision in this docket. In so doing, we have attempted to strike a fair balance between both the subscribers' desire for toll relief and the companies' concern with recovery of costs. The cost items we have considered are switching investment, trunk

facilities, annual charges, directory cost, leasing cost, toll and foreign exchange (FX) revenue reductions, originating and terminating access charges, and billing and collection. While the companies understandably favor rates that would provide full recovery of their costs, we find that to do so would result in unduly prohibitive rates and would doom the customer survey to failure. Further, we do not believe that Southland's earning of a negative rate of return, or at a level below the floor of its authorized rate of return, should be a determining factor on whether EAS should be implemented. Therefore, we will waive Rule 25-4.062(4), Florida Administrative Code, which provides for full recovery of costs from the subscribers in the petitioning exchange upon implementation of traditional, two-way, nonoptional EAS.

The countywide calling plan we are ordering in this docket is not the same plan we had proposed in Order No. 20605. Based upon the evidence we have received, we do not believe that the Pensacola rates should be applied to all the exchanges in this docket. Under Order No. 20605, Southland's residential subscribers in Molino would have received a $.30 reduction in basic monthly rates while those in Walnut Hill would have had their basic monthly rates increased by $1.70. Southern Bell's residential subscribers in the Century exchange would have experienced a $1.05 increase in their basic monthly rates. The rates for Southern Bell's residential subscribers in both the Cantonment and Pensacola exchanges would have remained unchanged. Presently both Cantonment and Molino have EAS to one another, as well as to Pensacola. With the implementation of countywide EAS, the Cantonment and Molino exchanges would only gain an additional 2,889 access lines. This is in sharp contrast to the Century exchange's gain of 116,970 access lines and Walnut Hill's gain of 116,967 access lines. Additionally, Pensacola subscribers would only gain 2,889 access lines from the addition of EAS to the Century and Walnut Hill exchanges. It is our belief that no subscribers should receive a rate reduction while increasing their calling scope, especially when other subscribers are receiving increases. While we do not believe Southland and Southern Bell should recover their full costs to implement EAS, we do believe, to the extent possible, that costs should be recovered from those subscribers causing the added costs. Further, we disagree with Southland's proposal that we should require some type of compensation agreement between Southland and Southern Bell to equalize any

deficiency in recovering costs associated with implementation of EAS in Escambia County. We believe that each company should bear its respective costs in its own territory to implement two-way, nonoptional EAS.

The plan we find to be most appropriate in this docket is countywide, flat-rate, nonoptional EAS between all the exchanges. This means that under our plan, subscribers in the Cantonment, Century, Molino, Pensacola and Walnut Hill exchanges will be able to call amongst themselves without incurring a toll charge. The companies are hereby directed to survey all subscribers in the Century, Molino and Walnut Hill exchanges at the following rates:

	CURRENT RATE			MO. INCREASE			NEW RATE		
EXCHANGE	R-1	B-1	PBX	R-1	B-1	PBX	R-1	B-1	PBX
Century	8.10	21.90	49.39	2.53	6.89	15.45	10.63	28.79	64.84
Molino	9.45	23.09	38.85	1.40	3.50	14.00	10.85	26.59	52.85
Walnut Hill	7.45	18.25	29.95	3.50	9.00	36.00	10.95	27.25	65.95

Cantonment and Pensacola subscribers will not have their rates increased and will not be included in the survey.

The survey is to be conducted on a consolidated basis, with the requirement that a simple majority of all eligible subscribers in the three exchanges vote in favor of countywide EAS. By requiring a simple majority, we are waiving Rule 25-4.063(5)(a), Florida Administrative Code, which requires fifty-one percent (51%) of all subscribers in each exchange to vote favorably. The combined access lines in the three exchanges to be surveyed total 4,429. Fifty-one percent (51%) would require 2,259 favorable votes whereas a simple majority will only require 2,215 votes, a difference of 44 votes. Citizens have asked that we only require a simple majority of those actually voting for the survey to pass. We cannot support Citizens' proposal since it could result in a minority of subscribers causing an increase in rates for a majority who had not approved the increase. All other requirements of Rule 25-4.063 should be adhered to, with the exception of paragraph (5)(a).

RULE WAIVER

A much debated issue in this docket was whether and to what extent we can waive our EAS rules. Elsewhere in this Order we have stated that we are waiving Rules 25-4.062(4) and 25-4.063(5)(a), Florida Administrative Code; thus, we believe it is appropriate to explicate our authority for doing so.

The EAS rules themselves contemplate the possibility of waiver. Rule 25-4.064, Florida Administrative Code, provides:

> Whenever inter-exchange traffic patterns are such that subscriber needs may be adequately served by alternative service offerings, or requests may not fully meet the requirements of these rules but higher than average inter-exchange calling may exist, the Commission may give consideration to other alternatives such as one-way Optional Calling Plans, inter-exchange message rate service, Usage Sensitive Pricing options, discounted toll offering, etc.

On first reading, it might seem that this rule does not pertain to traditional EAS (flat-rate, nonoptional, two-way calling) because of the reference to "other alternatives" in the Rule. However, on closer examination, it can be seen that the list of "other alternatives" is not meant to limit our discretion. Rather, the list of "other alternatives" is preceded by the words "such as," which signifies that the examples in the list are not meant to be exclusive. This is further confirmed by the fact that the list of "other alternatives" ends with the word "etc." Thus, once we have invoked Rule 25-4.064, as we have done here, we have stepped outside the EAS rules and are free to fashion appropriate situational remedies; subject, of course, to the normal confines of policy development through case by case adjudication.

Traditionally, when we have invoked Rule 25-4.064, we have still used the existing EAS rules as a framework. Then, as we explain the underlying rationale of our decision, we announce that we are "waiving" certain rules in conjunction with our decision. By using such a method, we give a recognizable structure to our development of policy through adjudication of individual cases. But as the above discussion makes clear, once we announce that we are proceeding under rule 25-4.064,

the EAS rules have already been waived. Thus, we are free to "waive" any of the EAS rules as we deem appropriate when proceeding by this method.

EFFECT UPON OTHER DOCKETS

In Docket No. 880069-TL, Order No. 20162, issued October 13, 1988, the Commission ordered that $10 million annually of Southern Bell's revenues be set aside for implementation of Optional Extended Area Service (OEAS) along various routes. After further analysis, it appears that the rates set for those routes will not result in use of the entire $10 million. We believe it is appropriate to use part of the $10 million for OEAS or EAS on additional routes as needed in order to further relieve EAS pressures. Therefore, we will require that $136,000.00 of the $10 million set aside in Docket No. 880069-TL be used to offset Southern Bell's costs of implementing EAS in Escambia County in this docket.

In Docket No. 820537-TP, Order No. 14452 implemented access charge bill and keep for local exchange companies (LECs) effective July 1, 1985. To keep each LEC financially whole, at least at the beginning, each company experiencing a surplus was ordered to dispose of the surplus by recording additional depreciation expense. Southland was given the additional option of using its surplus to separate its accounting records between Alabama and Florida. Southland used its 1985 winnings to separate its accounting records. It used its 1986, 1987 and 1988 winnings to offset increased depreciation expense in its last depreciation represcription. Its surplus thus far in 1989 has not been applied against any specific depreciation reserve account.

If flat-rate, nonoptional, two-way EAS is implemented, Southland will no longer receive the access charge revenue which caused the bill and keep surplus. If Southland no longer has an access charge surplus from bill and keep, it should no longer be required to record additional depreciation as an offset to the surplus. Allowing Southland to forgo recording depreciation expense as an offset to its interLATA winnings will reduce the company's intrastate expenses. This expense reduction should be considered as an offset to the loss in revenue Southland will experience from implementing EAS along the routes in this docket, thus decreasing Southland's loss.

The decrease in access charge revenue is the main cause of the revenue loss Southland will experience from implementing EAS; therefore, it is reasonable to offset the decrease in access revenue (winnings) with the decrease in depreciation expense. Southland shall have no further requirements for the disposition of its interLATA surplus, as required by Order No. 14452, effective at the time EAS is implemented in this docket.

III. MISCELLANEOUS ISSUES

Two additional issues were raised by public witnesses during the course of the hearing. Although these issues were not included in the Prehearing Order, the Prehearing Officer deemed it appropriate to address these issues in the disposition of this docket.

During the hearing, one of the public witnesses discussed the shut-in service provided by the Mennonite Church in Walnut Hill for its elderly. This witness requested that the Commission give consideration to allowing religious organizations throughout the state a special rate for church-sponsored telephonic services to their shut-in members.

For many years, some LECs provided telephone service to churches and certain qualifying charitable organizations at a twenty-five percent (25%) discount from the prevailing business rate. Clergy received a twenty-five percent (25%) discount off the residence rates. This discount service, known as the Eleemosynary Concession, was eliminated by Order No. 6504 in Docket No. 740805-TP, effective February 11, 1975.

There are several reasons for not authorizing concessionary service. One is the problem of controlling or limiting its application. Once started, it continues to grow until it has a substantial negative revenue impact. Also, the LECs have some difficulty in determining customer eligibility. If we were to authorize a concession, we would be creating a situation where the general body of ratepayers would be in effect contributing to churches and charitable organizations to which they might not want to contribute. Additionally, direct contributions to charitable organizations are generally disallowed in rate proceedings. Therefore, we reaffirm the Commission's previous decision to disallow Eleemosynary Concessions.

Another public witness asked the Commission to consider the possibility of creating a voluntary fund to assist low income subscribers with their telephone bills. While we commend this concept, we do not believe we are the appropriate agency to implement and monitor such a program. Although we will not mandate such a program, we wish to make it clear that our decision does not preclude establishment of voluntary programs of this nature.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that Southland Telephone Company and Southern Bell Telephone and Telegraph Company shall implement a nonoptional, flat-rate, two-way extended area service plan between the Cantonment, Century, Molino, Pensacola, and Walnut Hill exchanges which complies with the terms and conditions outlined in the body of this Order. It is further

ORDERED that Southland Telephone Company shall conduct a survey of those subscribers in the Molino and Walnut Hill exchanges. It is further

ORDERED that Southern Bell Telephone and Telegraph Company shall conduct a survey of those subscribers in the Century exchange. It is further

ORDERED that Southland Telephone Company and Southern Bell Telephone and Telegraph Company shall submit their survey letters and ballots for our approval prior to their distribution. It is further

ORDERED that Southland Telephone Company and Southern Bell Telephone and Telegraph Company are to begin conducting their respective surveys no later than October 20, 1989. It is further

ORDERED that the calling plan described in the body of this Order is to be implemented within twelve (12) months from the date of this Order if approved by the customer survey in the manner set forth herein. It is further

ORDERED that certain rules as described herein have been waived for the reasons set forth in the body of this Order. It is further

ORDERED that $136,000.00 of the $10 million annual revenue set aside for implementation of OEAS in Docket No. 880069-TL, Order No. 20162, shall be used to offset Southern Bell Telephone and Telegraph Company's costs of implementing EAS in this Docket as set forth herein. It is further

ORDERED that Southland Telephone Company shall have no further requirements for disposition of its interLATA surplus, as required by Order No. 14452, in Docket No. 820537-TP, effective at the time EAS is implemented in this docket, for the reasons set forth in the body of this Order. It is further

ORDERED that Southern Bell Telephone and Telegraph Company shall begin the appropriate action necessary to procure a waiver from Judge Greene's Modified Final Judgment in order to provide extended area service as set forth in this Order. It is further

ORDERED that the Commission's decision in Docket No. 740805-TP, Order No. 6504, to abolish the Eleemosynary Concession is affirmed as set forth in the body of this Order. It is further

ORDERED by the Florida Public Service Commission that while we will not establish a fund to assist low income subscribers with their telephone bills, neither will we preclude establishment of voluntary programs of this nature. It is further

ORDERED that this docket shall remain open pending the results of the survey.

By ORDER of the Florida Public Service Commission this 3rd day of October, 1989.

STEVE TRIBBLE, Director
Division of Records and Reporting

(S E A L)

ABG

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.59(4), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Any party adversely affected by the Commission's final action in this matter may request: 1) reconsideration of the decision by filing a motion for reconsideration with the Director, Division of Records and Reporting within fifteen (15) days of the issuance of this order in the form prescribed by Rule 25-22.060, Florida Administrative Code; or 2) judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or the First District Court of Appeal in the case of a water or sewer utility by filing a notice of appeal with the Director, Division of Records and Reporting and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.