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ORIGINAL
FILE COPY

January 23, 1995

Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Re: Docket No. ~~921074-TP~~
Expanded Interconnection Phase II and Local Transport
Restructure

Dear Ms. Bayo:

Please find enclosed for filing in the above matter an original
and 15 copies of GTE Florida Incorporated's Petition for Clarifi-
cation and Request for Extension, If Necessary.

Service has been made on the parties of record as evidenced by
the Certificate of Service.

Very truly yours,

Kimberly Caswell
Kimberly Caswell

KC:tas
Enclosures

Richard M. J. [Signature]

- ACK
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A part of GTE Corporation

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection Phase II)
and Local Transport Restructure)

Docket No. 921074-TP
Docket No. 930955-TL
Docket No. 940014-TL
Docket No. 940020-TL
Docket No. 931196-TL
Docket No. 940190-TL

Filed: Jan. 23, 1995

**GTE FLORIDA INCORPORATED'S PETITION FOR CLARIFICATION
AND REQUEST FOR EXTENSION, IF NECESSARY**

GTE Florida Incorporated (GTEFL) seeks clarification of two aspects of the Commission's Order number PSC-95-0034-FOF-TP in this docket (Order).

The first request for clarification concerns zone density pricing tariffs. The Order approves zone density pricing for the local transport elements of switched access and directs the LECs to use the FCC's zone density pricing concept as a guide. If LECs wish to deviate from the FCC scheme, they must identify variations and justify them. (Order at 65.)

At the federal level, LECs were generally not required to file cost studies to support their zone pricing filings. However, this Commission has directed LECs to include "supporting incremental cost data" with their zone density tariffs. Because this Commission mandate is itself a variation from the FCC concept, GTEFL is unclear as to its effect. GTEFL assumes that it need only file one set of costs to support its zone filing, rather than zone-specific cost studies. This is the closest interpretation to the FCC concept. Further, GTEFL can discern no good reason for zone-specific studies. As the Company understands the Order, the

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Commission is primarily concerned with cost differentials as between switched transport options, rather than as between zones.

If, however, the Commission expects zone-specific studies, they cannot be completed in the 90 days given in the Order. If zone-specific studies are required for Florida, they will need to be developed from scratch. This is a very complex process that will take at least six months. Therefore, GTEFL seeks a 90-day extension if LECs are required to produce zone-specific cost studies.

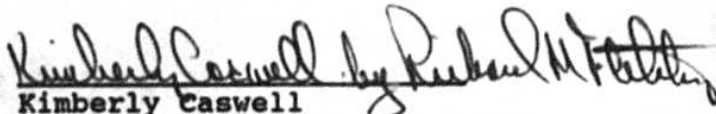
GTEFL's second request for clarification concerns the relationship between the local transport restructure (LTR) and zone density pricing filings. The Order seems to contemplate two separate filings--one for LTR and one for zone pricing. However, in practical terms, it seems that only one filing would be necessary. This tariff filing would set forth each switched transport rate element in association with three different rates, according to the zone in which a customer is located. Before GTEFL begins to develop its tariff revisions, it would like to know whether one or two filings are required. If two are required, the Company asks the Commission to clarify the relationship that is

supposed to exist between the rates in the LTR filing and those in the zone pricing filing.

For the reasons discussed in this filing, GTEFL asks the Commission to clarify its ruling on zone-density pricing cost studies and the contemplated relationship between LTR and zone-density filings. If zone-specific cost studies are required, GTEFL requests at least a 90-day extension in which to complete them.

Respectfully submitted on January 23, 1995.

By:



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Petition for Clarification and Request for Extension, If Necessary in Docket No. 921074-TP were sent by U.S. mail on January 23, 1995, to the parties on the attached list.

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