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REPLY TO

June 26, 1996

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

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Re: Frontier Communications of the South, Inc.

Dear Ms. Bayo:

Enclosed please find the original and 15 copies of the Petition of Frontier Communications of the South, Inc. for a limited scope proceeding to change its existing rate relationships. Copies have been furnished to parties listed on the certificate of service.

Sincerely,

David B. Erwin

DBE: akh Enclosures

cc: Jeff McGehee Laurie Maffett

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Frontier Communications of the South, Inc. for a limited scope proceeding to change its existing rate relationships. Docket No.

Filed: June 26, 1996

PETITION OF FRONTIER COMMUNICATIONS
OF THE SOUTH, INC. FOR A LIMITED
SCOPE PROCEEDING TO CHANGE ITS
EXISTING RATE RELATIONSHIPS

Frontier Communications of the South, Inc. petitions for & limited scope proceeding, pursuant to Sections 364.05 and 364.058, Florida Statutes, and Rule 25-4.215, F.A.C., to change its existing rate relationships.

In support of its petition, Frontier Communications of the South, Inc. states as follows:

- 1. There exists statutory and rule authority that would allow Frontier Communications of the South, Inc. to achieve the relief sought by this petition. The Commission has jurisdiction to change the rates of a regulated local exchange telephone company (LEC). Section 364.05, Florida Statutes. The Commission can undertake limited proceedings in any matter under its jurisdiction. Section 364.058, Florida Statutes. The Commission recently recognized the need to allow small local exchange companies to change their overall rate relationships, if they show that revenues under the proposed rate relationships will not exceed the revenues generated under the existing rate relationships. Rule 25-4.215, F.A.C.
 - 2. Frontier Communications of the South, Inc. is a small DOCUMENT NUMBER DATE

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LEC which operates two exchanges in the State of Florida in a sparsely populated area of northern Escambia County. The exchanges are the Molino Exchange and the Walnut Hill Exchange. Frontier Communications of the South, Inc. was previously operated as Southland Telephone Company. As the result of LEC toll bill and keep, Southland Telephone Company was granted a subsidy by Order No. 17743, Docket No. 850310-TL. The amount of the subsidy was revised by Order No. 18404 in the same docket. The subsidy was granted to a number of local exchange companies because of a shortfall in revenue generated by the movement to a system of bill and keep of intraLATA toll. In years two through four of the subsidy, the amounts received by each LEC were to be reduced, and any LEC with a shortfall remaining after year four was to be eligible for a long term subsidy. Southland Telephone Company was a LEC with such a shortfall, and in 1991 Southland became eligible to receive a long term subsidy in the amount of \$128,000 a year. See Table 2-4 of Order No. 18404, Docket No. 850310-TL. Southland Telephone Company first received the \$128,000 subsidy from the subsidy fund administrator in 1991, and Southland or its successor, Frontier Communications of the South, Inc., has continued to receive the subsidy each year since first becoming eligible for it.

3. In the telephone industry it has been common for subsidies to flow to higher cost LECs to minimize the recovery of costs through local rates. Frontier Communications of the South, Inc. is a higher cost LEC due to the nature of its service territory, and like other higher cost LECs, Frontier Communications of the South, Inc. is facing the prospect of losing the subsidies which were designed by the Commission to accomplish the goal of low rates for the customers of higher cost companies.

- 4. There were initially many LEC contributors to the intraLATA toll bill and keep subsidy pool. See Table 2-4, Order No.

 18404, Docket No. 850310-TL. Only one contributor remains,
 however, BellSouth Telecommunications (hereinafter BellSouth),
 previously known as Southern Bell Telephone and Telegraph Company, and there is only one recipient other than Frontier
 Communications of the South, Inc. See Order No. 95-0426-FOF-TL,
 Docket No. 850310-TL.
- 5. Upon passage of the new telecommunications law in Florida, it became possible for LECs to choose price regulation pursuant to Section 364.051, Florida Statutes, and BellSouth has chosen that form of regulation. BellSouth is now in a competitive environment for local exchange traffic. Frontier Communications of the South, Inc. has not yet chosen price regulation, but at some point, all LECs in Florida will be in a competitive environment, and Frontier Communications of the South, Inc. will have BellSouth as a potential or actual competitor.
- 6. Before Prontier Communications of the South, Inc. and BellSouth become competitors, Frontier Communications of the South, Inc. must eliminate its reliance upon revenue from BellSouth, but in order to achieve this necessary goal, Frontier

Communications of the South, Inc. must rearrange its rate relationships to generate the revenue that will be lost by eliminating its LEC toll bill and keep subsidy.

- 7. Frontier Communications of the South, Inc. proposes to rearrange its rate relationships as shown on Schedule E-2, attached hereto and made a part hereof. The proposed rearrangement is designed to eliminate the intraLATA subsidy paid to Frontier Communications of the South, Inc. by BellSouth.
- 8. Pursuant to Rule 25-4.215, F.A.C., Schedule E-2 in Form PSC/CMU 20, shows that the revenues generated under the proposed rate relationships will not exceed the revenues generated under existing rate relationships. The analysis is based upon data for units and revenues for the 1995 calendar year.
- 9. Frontier Communications of the South, Inc. requests that the Commission approve this request in a PAA order and that no rates or charges be changed or adjusted until such order has become final.

Respectfully submitted

David B. Erwin

Young, van Assenderp & Varnadoe, P.A. P. O. Box 1833

Tallahassee, Florida 32302

Attorneys for Frontier Communications of of the South, Inc. Post Office Box 37 Atmore, AL 36504

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Petition of Frontier Communications of the South, Inc. for a limited scope proceeding to change its existing rate relationships has been furnished by U.S. Mail or by hand delivery this the day of head. 1996 to the following:

Robert Vandiver Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Jack Shreve Office of the Public Counsel 111 W. Madison St., Rm. 801 Tallahassee, FL 32301

Nancy Sims BellSouth 150 S. Monroe, Ste. 400 Tallahassee, FL 32301

David B. Erwin

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