

AmTel

American Telecommunications Network, Inc.
919 Dillworth Street
St. Marys, Georgia 31558

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July 1, 1996

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

Re: Petition for Waiver

960805-TC

Dear Ms. Bayo:

Enclosed please find the original and fifteen (15) copies of our Petition for Waiver.

An extra copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.

Thank you for your assistance with this filing.

Sincerely,



Robert Spangler
President/CEO

Enclosures

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DOCUMENT NUMBER - DATE

Telephone 912/673-6000 - Fax 912/673-6004

07172 JUL -5 1996

FPSC-RECORDS/REPORTING

In re: }
 }
Petition of }
ATN, Inc. }
For Waiver }
_____ }

Docket No. 960805-TC

Filed:

PETITION FOR WAIVER

Pursuant to Commission Rule 25-24.505 (3), Florida Administrative Code, ATN Inc., ("ATN") petitions the Florida Public Service Commission (the "Commission") for a waiver of those rules and policies currently prohibiting ATN from concentrating access line service for inmate facilities, and to allow concentration of up to a maximum of three instruments to one line for coinless pay telephone services located in confinement facilities within the state of Florida. In support of its Petition, ATN states:

Identity of Petitioner

1. Petitioner's complete name and address are:

ATN, Inc.
919 Dilworth Street
St. Marys, Georgia 31558

2. ATN Inc. is a Georgia corporation, duly authorized to do business in the state of Florida under the name Amtel Network, Inc. ATN is a privately owned corporation. Pursuant to Commission Order No. PSC-93-0548-FOF-TC issued May 5, 1993 in Docket No. 930200-TC, ATN provides pay telephone services from confinement facilities located in the state of Florida.

3. All notices, pleadings, orders or other documents regarding this docket should be directed to :

DOCUMENT NUMBER-DATE
07172 JUL-5 1996
FPSC-RECORDS/REPORTING

Robert Spangler, President
ATN, Inc.
919 Dilworth Street
St. Marys, Georgia 31558
Telephone 912-673-6000
Facsimile 912-673-6004

Relief Requested

4. Pursuant to Rule 25-24.505 (3), F.A.C., ATN seeks a waiver of rule 25-24.515 (9), F.A.C. Specifically, ATN seeks authority to provide up to a three to one line concentration within inmate facilities for Public Telephone Access Service for ATN- provided automated store-and-forward coinless pay telephone equipment and technologies, installed in customer operated confinement facilities.

Background

5. ATN currently provides coinless pay telephone services to confinement facilities in the states of Florida and Georgia. In Florida, in accord with Rule 25-24.515 (9), ATN is currently authorized only to connect one pay telephone station for each access line provided by the local exchange company.

6. Technology advances in store-and-forward pay telephones and line concentrators have enabled inmate service providers to furnish quality calling services for callers and end users while meeting the unique inmate telephone access and security needs of the confinement facility. This well-developed and proven technology provides reliable call completion, without allowing inmates access to the public telephone network, thus reducing harassment and fraud. Concentration of up to three stations to each service line allows the inmate telephone provider to cost effectively meet the access requirements and to cover a wider range of inmate population concentrations within a specific confinement facility. If more than one instrument occupies a

single access line, only one instrument may use the line at a given time. All non-using stations would receive a busy signal until the access line became available. Petitioner respectfully states that technology advances and regulatory changes that have occurred since the time this rule was promulgated now make it appropriate for the commission to grant limited waivers from the rule such as this.

7. In addition, currently available concentrator equipment will allow access by all stations within the concentrated block of instruments to a series of access lines on a first-available line basis, thereby improving the statistical probability of connection to an outside line. The impact of multiple station to single line concentration on the inmate Telephone Access Service is estimated to be extremely minimal. Generated revenues for the provider and the facility operator will be improved, as will overall access to telephone service for the inmates, since more instruments can be deployed using this configuration.

8. ATN seeks to improve its cost effectiveness and competitive efficiency by providing line concentration of its coinless pay telephones located only in confinement facilities in order to better address the availability, security and control concerns that are paramount in the correctional environment. ATN desires only to do this in confinement facilities and will not use concentration anywhere else. Commission rule 25-24.515 (15) recognizes that regulatory requirements need to take into account the unique conditions and needs of confinement facilities. ATN has experience with line concentration in other states, as applied to confinement facilities. No adverse service effects have been observed or reported at those facilities where line concentration has been applied.

9. The Commission's approval of this waiver request is consistent with the legislative mandates to avoid "unnecessary regulatory constraints" and to eliminate rules that "delay or impair the transition to competition." Sections 364.01 (4) (e) and 364.01 (4) (f), Florida Statutes.

WHEREFORE, ATN respectfully requests that it be granted a waiver of the applicable rules and orders currently prohibiting concentration of line services for calls made from its store-and-forward coinless pay telephones located in confinement facilities, and for such other relief as may be appropriate.

Respectfully submitted, this 1st day of July, 1996.

ATN, Inc.


BY: _____

Robert Spangler, President
919 Dilworth Street
St. Marys, Georgia 31558
(912) 673-6000