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ORIGINAL  
FILE COPY

July 22, 1996

**BY HAND DELIVERY**

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

Re: Petition by the residents of Polo Park  
requesting extended area service (EAS)  
between the Haines City exchange and the  
Orlando, West Kissimmee, Lake Buena Vista,  
Windermere, Reedy Creek, Winter Park, Clermont,  
Winter Garden and St. Cloud exchanges  
Docket No. 930173-TL

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1
- LIN 3
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Dear Ms. Bayo:


Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of Brief and Posthearing Statement of Issues and Positions of Vista-United Telecommunications.

We are also submitting the Brief on a 3.5" high-density diskette generated on a DOS computer in WordPerfect 5.1 format.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.


Thank you for your assistance in this matter.

Sincerely,

  
J. Jeffrey Wahlen

Enclosures  
cc: All parties of record

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RECORDED  
  
EPSC-BUREAU OF RECORDS DOCUMENT NUMBER-DATE  
07677 JUL 22 1996  
EPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by the residents)  
of Polo Park requesting extended )  
area service (EAS) between the )  
Haines City exchange and the )  
Orlando, Kissimmee, West )  
Kissimmee, Lake Buena Vista, )  
Windermere, Reedy Creek, Winter )  
Park, Clermont, Winter Garden )  
and St. Cloud exchanges )  
\_\_\_\_\_ )

DOCKET NO. 930173-TL  
Filed: 7/22/96

**BRIEF AND POSTHEARING STATEMENT  
OF ISSUES AND POSITIONS OF  
VISTA-UNITED TELECOMMUNICATIONS**

Vista-United Telecommunications ("Vista" or the "Company") files this Brief and Posthearing Statement of Issues and Positions.

**I.**

**INTRODUCTION**

The proceeding began on February 19, 1993, when certain residents of the Polo Park area filed a petition with the Florida Public Service Commission ("FPSC" or "Commission") seeking non-optional extended area service between the Haines City exchange and the Orlando, Kissimmee, West Kissimmee, Lake Buena Vista, Windermere, Reedy Creek, Winter Park, Clermont, Winter Garden and St. Cloud exchanges. This matter was set for hearing by Order No. PSC-95-1396-FOF-TL, issued November 13, 1995.

The Haines City exchange is served by GTFL. Vista provides service in the Lake Buena Vista exchange and is only interested in the issues in this docket as they relate to the routes including that exchange.

DOCUMENT NUMBER-DATE

07677 JUL 22 96

FPSC-RECORDS/REPORTING

The final hearing in this docket was held on June 14, 1996 at the Polo Park East Community Building in Davenport, Florida. Vista did not sponsor a witness at the final hearing; however, Vista did submit a traffic study showing the traffic on the Lake Buena Vista to Haines City route. That exhibit was identified as Exhibit No. 2 and was admitted into the record without objection. See Tr. 122.

## II.

### BASIC POSITION

\* The calling patterns on the routes in this docket do not meet the existing Commission requirements to qualify for balloting for flat-rate, non-optional EAS, nor are they close enough to warrant any alternative form of toll relief.

## III.

### ISSUES AND POSITIONS

**ISSUE 1:** Is there a sufficient community of interest on the routes listed in Table A to justify surveying for nonoptional extended area service as currently defined in the Commission rules, or implementing an alternative interLATA toll plan?

Position:\* No. Commission Rule 25-4.060(3) states that a sufficient community of interest exists when the calling rate exceeds three Messages Per Access Line Per Month (M/A/Ms) and 50% of the subscribers in the exchange make two or more calls per month. Traffic on the routes in this docket does not meet either criteria.

Discussion: Vista's position on this issue is supported by Exhibit No. 2. This exhibit shows that the route involving the

Lake Buena Vista exchange does not even come close to qualifying under the Commission's rule.

**ISSUE 2: What other community of interest factors should be considered in determining if either an optional or nonoptional toll alternative should be implemented on these routes?**

Position:\* Additional community of interest factors often included are the location of schools, fire/police departments, medical/emergency facilities and county government. Davenport is in Polk County, and the traditional factors for that exchange reside within that county; therefore, traditional community of interest factors are not present.

Discussion: The Company's position on this issue is supported by the testimony of Ms. Harrell at Tr. 195. While there was a significant amount of public testimony in support of a toll alternative, the level of apparent interest shown at the public hearing is not reflected in the traffic study done by Vista. If there really is a community of interest between the Lake Buena Vista and Haines City exchanges, one would expect a much higher level of calling from Lake Buena Vista to Haines City.

**ISSUE 3: If a sufficient community of interest is found on any of these routes, what is the economic impact of each plan on the company (summarize in chart form and discuss in detail)?**

- a. EAS with 25/25 plan and regrouping;
- b. Alternative InterLATA toll plan; and
- c. Other (specify)

Position:\* No position.

**ISSUE 4:** Should subscribers be required to pay an additive as a prerequisite to surveying for extended area service or an alternative interLATA toll plan? If so, how much of a payment is required and how long should it last?

Position:\* No Position.

**ISSUE 5:** If a sufficient community of interest is found, what are the appropriate rates and charges for the plan to be implemented on these routes?

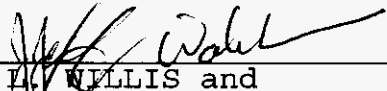
Position:\* No position.

**ISSUE 6:** If extended area service or an alternative interLATA toll plan is determined to be appropriate, should the customers be surveyed?

Position:\* Yes. If a non-optional plan is determined to be appropriate, the subscribers should be surveyed. All subscribers should have a voice in the implementation of such a plan since all subscribers will pay for the plan if implemented.

Discussion: Vista's position is consistent with the Commission's rules and practices in other cases.

DATED this 22nd day of July, 1996.

  
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ATTORNEYS FOR VISTA-UNITED  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (\*) this 22nd day of July, 1996, to the following:

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