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Telephone Company of Central Florida, Inc.

August 6, 1998

VIA OVERNIGHT COURIER

Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Re: Telephone Company of Central Florida, Inc. [TCCF]
1999 ALEC Data Request

Dear Ms. Bayo:

Enclosed for filing please find an original and 2 copies of the Telephone Company of Central Florida, Inc. 1999 ALEC Data Request as required by the Florida Public Service Commission's July 1st, 1999 correspondence.

Also enclosed is a sealed envelope marked "Confidential" which contains the original and attached confidential documents for confidential treatment pursuant to Section 364.183(1), F.S. Per the request of David Wolfe on August 4, 1999, the 10KSB referred to in Items 9 and 12 has not been enclosed.

Please acknowledge receipt of this filing by stamping the extra copy and returning it in the self-addressed stamped envelope provided for this purpose.

Questions regarding this filing may be directed to me at 407-328-5002, ext. 104.

Sincerely,

AFA	_____
APP	_____
CAF	_____
CMU	_____
CTR	_____
EAG	_____
LEG	_____
MAS	_____
OPC	_____
RRR	_____
BEC	_____
MAW	_____
DTH	_____

Barbara Greene
Barbara Greene
Regulatory Administrator

Enclosures

800-314-8428 Toll Free 407-328-5002 Phone 407-321-1454 Fax

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DOCUMENT NUMBER-DATE

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REC-RECORDS/REPORTING

Telephone Company of Central Florida, Inc.

Response to: 1999 ALEC Data Request

- 1.a. Yes.
- 1.b.
- 1.c. Reference Telephone Company of Central Florida's Telecommunications Price List, effective June 13, 1997.
- 1.d. Yes.
- 1.e.
- 1.f. Reference Telephone Company of Central Florida's Telecommunications Price List, effective June 13, 1997.
- 2.a. Yes.
- 2.b. Multi-Line.
- 2.c. Reference Telephone Company of Central Florida's Telecommunications Price List, effective June 13, 1997.
- 2.d. Yes.
- 2.e. Multi-Line.
- 2.f. Reference Telephone Company of Central Florida's Telecommunications Price List, effective June 13, 1997.
- 3.a. TCCF is a reseller.
- 3.b.
- 3.c.
- 3.d. No.
- 3.e. Essx Service.

- 3.f. Clearly, the most significant barrier to competition within the Florida marketplace is the "lack of parity" which exists between the services provided by the LECs to their retail customers as compared to the services provided to their resellers. Turnaround times provided to the reseller for the provisioning of new orders, the processing of adds, moves and changes and the working of trouble tickets exceed the turnaround times provided to retail customers. Additionally, the OSS available to resellers is not equal to the OSS used by LEC personnel when processing retail orders. This "lack of parity" makes it more difficult and more costly for the reseller to acquire and service the account and easier for the LEC to recapture the account. The process as it exists today is a lose/lose for the reseller and a win/win for the LEC.

The discount provided to the reseller does not cover the cost of acquiring and servicing the account because the tools utilized by the LEC when acquiring and servicing their customers is not available to the resellers. The discount is quickly eaten up by labor costs alone.

- 3.g. The difficulties experienced with the Resale Agreements currently in place between TCCF and BellSouth, Sprint-United and GTE simply stated is that the LECs are not in compliance with "parity of service" commitments contained within the agreements. The complaint and/or arbitration process available is a lengthy, expensive and intimidating process which prevents most small-to-mid size resellers from attempting to enforce the terms and conditions of their agreements with the LECs. The LECs understand and work the system to their advantage. They have unlimited legal and financial resources and therefore have an extremely unfair advantage over the typical reseller. Recently, TCCF spent in excess of \$25,000 in legal fees alone in order to take advantage of the arbitration process currently in place within the State.

TCCF recommends that the Commission be given more authority to ensure compliance up to and including the ability to fine the non-compliant party each day until full compliance has been achieved or to increase the reseller discount until compliance exists. The Commission must be given the authority to penalize the non-compliant party or the system has no real impact on the financially advantaged LEC.

- 3.h. TCCF's long range plan does include becoming facilities based. We would estimate that this change will take place within the next 2-3 years.

3.i. No.

4. N/A

5. TCCF is a reseller of local and long distance telecommunication services.

6. No.

7. N/A

8. TCCF does offer package plans that combine local and long distance service. These plans are based upon monthly long distance usage and total number of business lines. No special terms and conditions apply. Customers are free to choose long distance only, local service only or a combination thereof.
9. Refer to 10KSB not enclosed per the request of David Wolfe.
- 10.a. TCCF believes that the Commission should follow-up on reseller complaints by visiting with various resellers that report "lack of parity" issues so that the Commission can view first hand the hardships imposed upon the resellers. Representatives of the various LECs could also attend the on-site meeting with the reseller to eliminate the possibility of complaints from the LEC about unfair treatment. A generic docket on OSS should be established and the LECs should be required to comply with the Telecom Act by providing equal access to OSS. Failure to comply should result in fines or an increase in the reseller discount until compliance has been achieved.

The Commission must put a task force together and send it out into the field to visit with the resellers and view first hand the difficulties encountered when provisioning orders and servicing accounts. The status of competition can only be observed from the field.

- 10.b. An industry wide issue that requires immediate attention is to impose a law preventing customers from jumping to another service provider until the outstanding balance on their account has been paid in full or an official complaint has been filed with the Commission regarding payment of their outstanding balance. Such a law would benefit all LECs and resellers. TCCF has found that many customers understand and work the system to their advantage by running up large bills and jumping to another provider once threatened with the disconnection of service. Bad debt issues can easily add to the failure of a small-to-mid size reseller attempting to survive in a market with almost non-existent profit margins, lack of parity issues and the cost of start-up operations.
11. See our response to 3.f., 3.g., 10.a. and 10.b. above. Full compliance with the Telecommunications Act must be achieved or competition will fail. The burden of forcing compliance must rest with the FCC and the state Commissions not with the resellers. The Commission must be given the ability to financially penalize non-compliant entities. TCCF would welcome a visit from a Commission task force to review the status of OSS and other parity issues.
12. Refer to 10KSB not enclosed per the request of David Wolfe.
- 13.a. Total Florida intrastate operating revenues, year ending 12/31/98, was . TCCF does not separate between residential and business.

13.b TCCF's 1998 assessable revenues, as reported for Florida revenue assessment fees follows was:

Intrastate	\$
Basic Local Service	\$ _____
Total	\$