

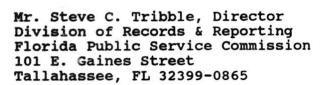
GTE Florida Incorporated

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May 31, 1991



Dear Mr. Tribble:

Docket No. 910060-TP

Amendment of Rule 25-4.110, F.A.C.,

pertaining to customer billing

Please find enclosed the original and 15 copies of GTE Florida Incorporated's Comments and Request for Hearing for filing in the above stated matter.

Service has been made as indicated on the attached Certifi-APP cate of Service. If there are any questions with regard to CAF this matter, please contact the undersigned at (813) 228-

3087. CMU

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Thomas R. Parker LIN

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GTE Florida Incorporated GTE South Incorporated A part of GTE Corporation DOCUMENT NUMBER - DATE

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: JO-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Amendment of Rule 25-4.110,)

F.A.C., pertaining to customer ) Docket No. 910060-TP

billing. ) Filed: 5-31-91

## COMMENTS AND REQUEST FOR HEARING

Comes now GTE Florida Incorporated ("GTEFL"), pursuant to Order No. 24477 issued on May 6, 1991, and submits its comments and request for hearing pertaining to the proposed modifications to Commission Rule 25-4.110 entitled "Customer Billings." In support thereof, GTEFL respectfully states as follows:

language amendments to Commission Rule 25-4.110 which strives to provide additional information to 900 and 976 customers. GTEFL's motive for submitting the instant comments and request for hearing does not concern the substantive reasons for proposing such a rule amendment. Rather, GTEFL's pleading is necessitated by the fact that GTEFL cannot comply with the rule as drafted until late 1991 or early 1992. Therefore, GTEFL finds itself in the position that it must preserve its rights by requesting a hearing regarding the proposed rule in order to avoid a potential show cause situation. If the suggestions contained in this pleading are found to be appropriate, GTEFL will withdraw its request for

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hearing at the appropriate time in order to expedite implementation of the rule.

- 2. The proposed amendments to Commission Rule 25-4.110 require the billing LEC to segregate charges for 900 and 976 calls from regular long distance or local charges by creating a separate heading as follows: 900 or 976 Nonregulated Charges. In addition, said rule requires the following information to be clearly and conspicuously disclosed on each page of the bill containing 900 or 976 charges: (1) nonpayment of 900 or 976 charges will not result in discontinuance of service; and (2) customers can obtain blocking of 900 or 976 service from the local exchange company. GTEFL's billing system cannot accommodate the foregoing requirements at this time without the expenditure of unnecessary expenses and diversion of limited resources.
- 3. GTEFL is in the process of changing its billing system from the Customer Records and Billing System (CRB) to the Customer Billing Services System (CBSS). Due to this major system conversion, any additional time or expense associated with modifying the old CRB system is imprudent and of limited value. Indeed, if the Commission required CRB to be updated to comply with the proposed rule, GTEFL would have to make its billing modifications twice once for CRB and once for CBSS.

<sup>1</sup> CBSS is currently scheduled to cut during mid-November 1991. However, as with all major system changeouts, the foregoing date is subject to modification.

- 4. GTEFL proposes that the rule be amended to include the following additional language which would resolve GTEFL's problem:
  - 1(c) Local exchange carriers have until March 1, 1992 to bring their billing systems into compliance.
- 5. If the foregoing language is acceptable to the Commission, GTEFL is willing to resolve this matter without the necessity of a hearing. However, GTEFL is concerned that it is operating at its peril unless a hearing is held. Therefore, GTEFL requests a hearing in this matter to avoid the potential for being subject to a show cause proceeding in the event a rule is adopted without the foregoing language.

WHEREFORE, GTE Florida Incorporated moves the Florida

Public Service Commission to adopt the proposed language

allowing the local exchange carrier a transition period in

which to bring its billing system into compliance with the

rule and to hold a hearing regarding the same.

Respectfully submitted this the 31st day of May, 1991.

JAMES V. CARIDEO THOMAS R. PARKER WAYNE L. GOODRUM JOSEPH W. FOSTER KIMBERLY CASWELL

THOMAS R. PARKER
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Attorneys for GTE Florida Incorporated

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of GTE Florida Incorporated's Comments and Request for Hearing in Docket No. 910060-TP has been furnished by U.S. mail on the 31st day of May, 1991, to the parties on the attached list.

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