

FLORIDA PUBLIC SERVICE COMMISSION

Fletcher Building
101 East Gaines Street
Tallahassee, Florida 32399-0850

M E M O R A N D U M

AUGUST 29, 1991

TO : DIRECTOR, DIVISION OF RECORDS AND REPORTING

FROM : DIVISION OF COMMUNICATIONS [BROWN, TAYLOR] *SB*
DIVISION OF LEGAL SERVICES [MURPHY] *cm* *AK* *JD*

RE : DOCKET NO.: 910861-TL - TARIFF PROPOSAL TO INTRODUCE
TELEPHONE SERVICE PRIORITY (TSP) SERVICE BY UNITED
TELEPHONE COMPANY OF FLORIDA (T-91-333, FILED 7/15/91)

AGENDA: SEPTEMBER 10, 1991 - CONTROVERSIAL - PARTIES MAY
PARTICIPATE

CRITICAL DATES: EFFECTIVE DATE SEPTEMBER 13, 1991

SPECIAL INSTRUCTIONS: NONE

DISCUSSION OF ISSUES

ISSUE 1: Should the tariff request by United Telephone Company (United) to introduce Telecommunications Service Priority (TSP) service be approved?

RECOMMENDATION: Yes, the Commission should approve United's request to introduce Telecommunications Service Priority (TSP) service.

STAFF ANALYSIS: On July 15, 1991 United Telephone Company filed tariff revisions to introduce the TSP service.

As noted in previous TSP filings, TSP service is designed to meet today's emergency preparedness needs under the National Security Emergency Preparedness (NSEP) telecommunication service. The TSP system for NSEP ensures that priority restoration is given to vital telecommunications services. TSP circuit assignments are given to telecommunication service vendors (i.e., LECs and IXCs) based on priority levels established by the TSP system. The service vendors then use the TSP assignments to determine the sequence in which they respond to restoration and provisioning requirements. The TSP designation can only be granted by the TSP program office and the vendor has no control over the designation.

DOCUMENT NUMBER-DATE

08663 AUG 29 1991

REC-RECORDS/REPORTING

Docket No. 910861-TL
August 29, 1991

The FCC has ordered the phase out of the current Restoration Priority service with the implementation of the new TSP program. Staff was concerned whether vital services would receive the priority that they should. However, Rule 25-4.070 (4), Florida Administrative Code, which states: "Priority shall be given to service interruptions which affect public health and safety that are reported to and verified by the company and such service interruptions shall be corrected as promptly as possible on an emergency basis" alleviated our concern. Services that are unable to obtain a TSP designation but meet the requirements of Rule 25-4.070 (4) would be expected to receive priority treatment under the Rule. TSP circuits are so few that there should be no noticeable difference in treatment for services unable to obtain a TSP designation.

The proposed tariff only impacts those circuits that receive the TSP designation. Staff believes that the tariff should be limited to only those services which receive official designation through the TSP program office. The Commission recently approved Southern Bell's and GTE's tariffs which contained restrictions as to who could receive TSP service. United's tariff filing also noted these restrictions, the tariff states that TSP service is limited to qualifying state and local government, the federal government, foreign governments and certain private telecommunications services.

United has filed tariff revisions that are similar to the tariff recently approved for Southern Bell and GTE in rate structure, contribution level and cost recovery. United has proposed rates for TSP service based on cost. Staff recognizes that United, GTE and Southern Bell have different costs, but staff believes that the rates should be similar in the way costs are recovered. Staff believes that United's tariff proposal is consistent with Southern Bell's and GTE's. United's proposed rates and cost are outlined below:

Docket No. 910861-TL
August 29, 1991

UNITED TSP RATE ELEMENTS	UNITED PROPOSED RATES	UNITED COSTS	SOUTHERN BELL RATES
PRIORITY PROVISIONING	\$85.00 NRC	\$83.42	\$42.00 TO \$83.00
RESTORATION PRIORITY IMPLEMENTATION	\$47.00 NRC	\$45.46	\$65.00
PRIORITY LEVEL CHANGE	\$45.00 NRC	\$43.38	\$65.00
RESTORATION PRIORITY	\$6.00 RECURRING	\$5.31	\$3.00

Staff recommends that United's proposed tariff filing to introduce TSP service be approved. Staff believes that the tariff is no different than the TSP tariffs recently approved for Southern Bell and GTE, and should be approved.

Docket No. 910861-TL
August 29, 1991

ISSUE 2: Should this docket be closed?

RECOMMENDATION: Yes, If Issue 1 is approved this tariff should become effective on September 13, 1991 with any increase held subject to refund. If no timely protest is filed, this docket will be closed.

STAFF ANALYSIS: At the conclusion of the protest period, if no protest is filed, this docket should be closed.

910861.STB