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HAND DELIVERY

July 10, 1995

Ms. Blanca Bayo, Director Division of Records and Reporting Florida Public Service Commission Room 110, Easley Building 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket No. 920260-TL

Dear Ms. Bayo:

Enclosures

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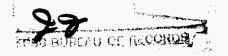
Enclosed is an original and fifteen copies of McCaw Communications of Florida, Inc.'s Prehearing Statement in the above-referenced docket. Also enclosed is a 3 1/2" diskette with the document on it called "920260PR.HRG" in WordPerfect 6.1 format.

Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

Your attention to this filing is appreciated.

Singerely R. Self Floyd

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Comprehensive Review of the Revenue Requirements and Rate) Stabilization Plan of Southern Bell Telephone and Telegraph Company

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Docket No. 920260-TL Filed: July 10, 1995

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PREHEARING STATEMENT OF MCCAW COMMUNICATIONS OF FLORIDA, INC.

McCaw Communications of Florida , Inc. ("McCaw"), on behalf of itself and its Florida regional affiliates, through undersigned counsel, respectfully submits its prehearing statement.

A. APPEARANCES

Floyd R. Self, Esq. and Norman H. Horton, Jr., Esq. Messer, Vickers, Caparello, Madsen, Goldman & Metz, P.A. Post Office Box 1876 Tallahassee, FL 32302-1876

On behalf of McCaw Communications of Florida, Inc. and its Florida regional affiliates

B. WITNESSES

Issues

<u>Witness</u> Kurt C. Maass, Direct

Issues 1 and 3

C. EXHIBITS

McCaw has not prefiled any exhibits in this proceeding. McCaw

reserves the right to present exhibits, if necessary, as may be required by later filed testimony, the completion of discovery, or new issues identified at the prehearing conference.

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D. BASIC POSITION

McCaw's proposal to implement the decision in Docket No. 940235-TL should be approved and the proposals of Southern Bell and CWA should be rejected.

E. ISSUES AND POSITIONS

<u>ISSUE 1</u>: Which of the following proposals to dispose of \$25 million for Southern Bell should be approved?

ISSUE 1a: SBT's proposal to implement the Extended Calling Service (ECS) plan pursuant to the tariff filed on May 15, 1995. (T-93-304)

<u>McCaw's Position</u>: Southern Bell's proposal should be rejected as it would give Southern Bell an unfair competitive advantage in the intraLATA toll market.

ISSUE 1b: CWA's proposal to reduce each of the following by \$5 million:

- 1. Basic "lifeline" senior citizens telephone service;
- 2. Basic residential telephone service;

- 3. Basic telephone service to any organization that is non-profit with 501(c) tax exempt status:
- 4. Basic telephone service of any public school, community college and state university;
- 5. Basic telephone service of any qualified disabled ratepayer;

<u>McCaw's Position</u>: CWA's proposal should be rejected given the present price levels of the targeted services and the availability of lifeline in Florida.

ISSUE 1c: McCaw's and FMCA's proposal that a portion be used, if necessary, to implement the decisions rendered in DN 940235-TL.

<u>McCaw's Position</u>: McCaw's proposal to implement the decisions in Docket No. 940235-TL should be approved. If there is any possibility that the new telecommunications law would operate to defeat implementation of the policies rendered in Docket No. 940235-TL, then it is appropriate to implement such policies in this docket.

ISSUE 1d: Any other plan deemed appropriate by the Commission?

<u>McCaw's Position</u>: After implementing the Docket No. 940235-TL decision, any remaining funds should be used to reduce monopoly

services where the rate levels are greatly in excess of cost or those services where there are competitive inequalities between classes of customers, for example as between Southern Bell retail and wholesale services.

<u>ISSUE 2</u>: If the Southern Bell proposal is approved, should the Commission allow competition on the Extended Service Calling routes? If so, what additional actions, if any, should the Commission take?

<u>McCaw's Position</u>: Yes, competition should be allowed on the ECS routes subject to the conditions identified by the IXCs.

ISSUE 3: When should tariffs be filed and what should be the effective date?

<u>McCaw's Position</u>: The tariffs should be filed no later than two weeks after the Agenda Conference decision to be effective October 1, 1995.

ISSUE 4: Should this docket be closed?

McCaw's Position: No.

F. PENDING MOTIONS FILED BY MCCAW COMMUNICATIONS

McCaw Communications of Florida, Inc.'s Motion to Compel Discovery Answers and Sanctions from Southern Bell, filed July 5, 1995.

Dated this 10th day of July, 1995.

Respectfully submitted, MESSER, VICKERS, CAPARELLO, MADSEN, GOLDMAN & METZ, P.A. Post Office Box 1876 Tallahassee, FL 32302-1876 (904) 222-0720

FLOYD (R. SELF, 250) NORMAN H. HORTON, JR., ESQ.

Attorneys for McCaw Communications of Florida, Inc. and its Florida regional affiliates

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of McCaw Communications of Florida, Inc.'s Prehearing Statement in Docket No. 920260-TL has been sent by Hand Delivery (*) and/or U.S. Mail on this 10th day of July, 1995 to the following parties of record:

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BY: