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*ORIGINAL*

October 31, 1997

**BY HAND DELIVERY**

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

Re: Docket No. **970744-TP**

Dear Ms. Bayo:


Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of ALLTEL's Implementation Plan.

We are also submitting the Implementation Plan 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

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_ Enclosures
- CMU  cc: All parties of record
- CTR \_\_\_\_\_  
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EPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
**11235 OCT 31 5**  
EPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Establishment of eligible )  
telecommunications carriers )  
pursuant to Section 214(e) of the )  
Telecommunications Act of 1996. )

In re: Implementation of changes )  
in the Federal Lifeline Assistance )  
Plan currently provided by )  
telecommunications carriers of )  
last resort. )

DOCKET NO. 970744-TP  
FILED: October 31, 1997

ALLTEL'S IMPLEMENTATION PLAN

Pursuant to Order No. PSC-97-1261-FOF-TP, and Rule 25-22.037(2), F.A.C., and its Motion for Extension of Time, ALLTEL Florida, Inc. ("ALLTEL"), submits the following toll limitation implementation plan:

Introduction

1. On October 23, 1997, ALLTEL requested a waiver of the requirement to provide full toll limitation services. In addition, it requested an extension of time to submit an implementation plan.

2. ALLTEL has further investigated the steps necessary to implement full toll limitation services as set forth in the FCC's Order. ALLTEL is currently offering Toll Blocking in all of its exchanges, but does not and cannot offer Toll Control as defined in the FCC Order. Accordingly, ALLTEL does not need a waiver of the FCC's Toll Limitation Requirements as they relate to Toll Blocking. ALLTEL's position on Toll Control is set forth below.

Toll Control

3. As of year end 1996, ALLTEL had 53 interexchange carriers

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operating in its exchanges in Florida. Currently, each of those IXCs rates its own toll calls and only forwards the rated messages to ALLTEL if ALLTEL bills for that IXC. If ALLTEL bills for the IXC, the transfer of records is not done on a real time, on-line basis. The lag in time between when a toll call is completed and when ALLTEL receives the rated call is a minimum of one day for large IXCs. The lag for rated received collect calls and smaller IXC's rated toll calls can easily be a week or longer. For ALLTEL to rate toll for low income subscribers on a real time basis, each toll message would need to be instantaneously transferred from ALLTEL's switch to ALLTEL's data center for processing. ALLTEL would then need the capability to apply the tariff rates and conditions for each of the 53 IXCs. This is not the way the rating process currently works.

4. The same general problem exists for LEC provided intraLATA toll.

5. To implement Toll Control as envisioned by the FCC, a new process will have to be developed. IXCs would need to receive and rate each message and then transfer the resulting charge for each toll message to the responsible LEC on a real time basis. LEC provided intraLATA toll would also need to be rated on a real time basis. The responsible LEC would then have to accumulate each customer's IXC and LEC provided toll on a real time basis and compare the results to the preset limit on toll for low income subscribers. Once the limit is reached, the low income subscriber's ability to make toll call would need to be

discontinued on a real time basis. This would take a nationwide network similar to the one being established for local number portability; however, doing so would be more complex since it would require many more processes than the "single dip" for number portability.

6. Based on ALLTEL's investigation, it is clear that the systems and technology necessary to implement Toll Control are not available. The cost of developing the technology and systems will be staggering. ALLTEL is not aware of any plans to develop these systems and does not anticipate the development of the necessary technology and systems in the foreseeable future. Accordingly, ALLTEL suggests that the FPSC grant a blanket waiver for the Toll Control requirement pending development of the necessary technology and systems.

7. ALLTEL further understands that the FCC is or will soon be in the process of reconsidering its Order as it relates to Toll Control.

#### Plan

8. Accordingly, with this as background, ALLTEL proposes to take the following steps:

(a) Continue offering Toll Blocking to its customers in accordance with its FPSC approved tariffs.

(b) Continue monitoring the availability of the technology and systems necessary to implement Toll Control.

(c) Continue monitoring the activity of the FCC to determine whether it will reconsider its Order as it relates to Toll Control.

(d) Advise the FPSC and its Staff when and if the technology and systems necessary to provide Toll Control become available.

(e) If the FCC does not reconsider its Order as it relates to Toll Control, and the technology and systems necessary to implement Toll Control become available, determine (1) the incremental costs of implementing Toll Control, (2) the availability of and timing for receipt of reimbursement of the incremental costs of the implementation of Toll Control, and (3) market demand for Toll Control services.

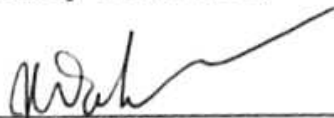
(f) Once those determinations have been made, prepare a time table for implementing Toll Control in portions of its territory where it makes economic sense to do so in light of the incremental costs and market demand for the service.

(g) Submit the time table to the FPSC for its review and consideration.

(h) Cooperate with the FPSC and its staff as the FPSC attempts to implement the Toll Limitation Requirements in the FCC Order.

DATED this 31<sup>st</sup> day of October, 1997.

Respectfully submitted,



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Post Office Box 391  
Tallahassee, FL 32302  
(850) 224-9115

ATTORNEYS FOR ALLTEL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been served by U. S. Mail or hand delivery (\*) on this 21<sup>st</sup> day of October, 1997 to the following:

Mr. Will Cox\*  
Staff Counsel  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Ms. Ann Marsh\*  
Division of Communications  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

  
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ATTORNEY

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