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ORIGINAL

March 16, 1998

BY HAND DELIVERY

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

Re: Docket No. 970882-TI

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of ALLTEL Florida, Inc.'s Posthearing Statement.

We are also submitting the Posthearing Statement 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 _____
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CAF 2
CMU 2 Enclosures
CTR cc: All parties of record
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION **ORIGINAL**

In re: Proposed Rule 25-24.845,)
F.A.C., Customer Relations, Rules)
Incorporates; and proposed amendments)
to Rule 25-4.003, F.A.C., Definitions;)
Rule 25-4.110, F.A.C., Customer)
Billing; Rule 25-4.118, F.A.C.,)
Interexchange Carrier Selection; and)
Rule 25-24.490, F.A.C., Customer)
Relations; Rules Incorporated.)

DOCKET NO. 970882-TI
Filed: March 16, 1998

ALLTEL FLORIDA INC.'S POSTHEARING STATEMENT

Pursuant to Order No. PSC-97-1071-PCO-TP, and Rule 25-22.056, Florida Administrative Code, ALLTEL FLORIDA, INC. ("ALLTEL" or the "Company") submits the following Posthearing Statement:

I.

Introduction

The final hearing in this docket was held on February 6 and 16, 1998. Numerous parties presented testimony and comments on the proposed rule. At the beginning of the hearing, the Commission voted to sever the portions of proposed rule 25-4.110(11)(3)(a), F.A.C., relating to the PIN number bill blocking option from the proceeding. [Tr. 43] In so doing, the Commission eliminated from this proceeding the portion of the proposed rule that was of greatest concern to ALLTEL.

ALLTEL has reviewed the record of the proceeding and the proposals of the parties. This posthearing statement reflects the views of ALLTEL on the proposed rules based on the evidence in the record of the proceeding. ALLTEL's position on the issues and its

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arguments in support of those positions are set forth below. Its position for publication in the staff recommendation are indicated with an asterisk (*).

II.

Position on Issues

Issue 1: Should the Commission adopt the new rule 25-24.845, F.A.C., as proposed by the Commission?

Position: * Yes. Any rule applicable to incumbent local exchange companies should be applicable to ALBCs or CLBCs.

Discussion: Regulatory requirements should be imposed on local providers in a nondiscriminatory manner. Extending these customer relations rules to ALBCs and CLBCs is consistent with this principle.

Issue 2: Should the Commission adopt the amendments to rule 25-4.003, F.A.C., as proposed by the Commission?

Position: * ALLTEL does not object to the definitional changes in this rule as proposed by the Commission.

Discussion: Rule 25-4.003 contains definitions only, and does not impose restrictions or regulatory requirements. ALLTEL does not object to the changes proposed in the notice of rulemaking, but notes that some of the proposed definitional changes may not be necessary or should be amended if portions of the substantive portions of the proposed rules are not adopted. For example, if BellSouth's proposal to allow a PIC-Freeze based on a telephone call from a customer is accepted, the definition in 25-4.003 (41) would need to be amended.

Issue 3: Should the Commission adopt the amendments to rule 25-4.110, F.A.C., as proposed by the Commission?

Position: * No. The requirement to include certificate numbers on customers bills should be deleted as redundant and unnecessary.

Discussion: ALLTEL agrees with the LECs and IXC that believe that adding an IXC's certificate number on the customer bill is an unnecessary and redundant requirement that will provide little useful information to customers. [Tr. 481, Scobie; 406, Hendrix; and 533, King] For most consumers, certificate numbers are meaningless and irrelevant, and the requirement to include them on the bill would impose additional costs without a commensurate benefit. [Tr. 534, King; 406, Hendrix; 481, Scobie]

Issue 4: Should the Commission adopt the amendments to rule 25-4.118, F.A.C., as proposed by the Commission?

Position: * The Commission should not adopt the proposed changes unless it finds that they are consistent with the related FCC rules and are the least cost alternative that substantially accomplish the objective.


Discussion: The Commission has been presented with a great deal of evidence about slamming. The evidence shows that most of the major IXCs and the LECs have implemented policies and procedures to safeguard against slamming. The evidence also shows that the bulk of the problem is caused by unscrupulous carriers that are not following existing rules. When adopting any additional safeguards, the Commission should take care to ensure that the additional safeguards are cost effective and narrowly tailored to address the

major offenders and their tactics, not the relatively small number of inadvertent slips attributable to human error or customer confusion.

Issue 5: Should the Commission adopt the amendments to rule 25-24.490, F.A.C., as proposed by the Commission?

Position: * ALLTEL does not object to the proposed changes.

DATED this 16th day of March, 1998.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 16th day of March, 1998, to the following:

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