



# Public Service Commission

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## -M-E-M-O-R-A-N-D-U-M-

RECORDS AND  
REPORTING

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**DATE:** MARCH 4, 1999

**TO:** DIRECTOR, DIVISION OF RECORDS AND REPORTING (BARRETT)

**FROM:** DIVISION OF COMMUNICATIONS (BARRETT) *meB*  
DIVISION OF LEGAL SERVICES (B. KEATING) *AK MCB*

**RE:** DOCKET NO. 971627-TL - PETITION BY RESIDENTS OF FT. WHITE REQUESTING EXTENDED AREA SERVICE BETWEEN FT. WHITE EXCHANGE IN COLUMBIA COUNTY AND GAINESVILLE EXCHANGE IN ALACHUA COUNTY.

**AGENDA:** MARCH 16, 1999 - REGULAR AGENDA - POST HEARING DECISION - PARTICIPATION LIMITED TO COMMISSIONERS AND STAFF

**CRITICAL DATES:** NONE

**SPECIAL INSTRUCTIONS:** NONE

**FILE NAME AND LOCATION:** S:\PSC\LEG\WP\971627a.RCM

### CASE BACKGROUND

On September 17, 1997, residents of the Ft. White exchange filed a petition for extended area service (EAS) between the Ft. White and Gainesville exchanges. The Ft. White exchange is served by ALLTEL, Florida, Incorporated (ALLTEL) and is located in the Jacksonville Local Access and Transport Area (LATA). The Gainesville exchange is served by BellSouth Telecommunications, Incorporated (BellSouth or BST) and is located in the Gainesville LATA. The Ft. White/Gainesville route is interLATA and involves BellSouth.

The customer and technical hearings were conducted on January 11, 1999 in Ft. White, Florida.

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By Order No. PSC-98-0098-FOR-TL, issued January 15, 1998, the Commission ordered ALLTEL to conduct one-way traffic studies from the Ft. White exchange to the Gainesville exchange. Staff notes that BellSouth was not required to conduct traffic studies because it is a price regulated local exchange company (LEC).

By Order No. PSC-98-0950-FOR-TL, issued on July 14, 1998, this Docket was set for hearing.

On July 15, 1997, the Federal Communications Commission (FCC) issued Order 97-244 which indicates that the FCC will continue to consider requests for waiver of LATA boundaries in order to allow the provision of flat-rate, non-optional local calling service.

**DISCUSSION OF ISSUES**

**ISSUE 1:** Is there a sufficient community of interest on the Ft. White/Gainesville route to justify non-optional extended area service (EAS) as currently defined in Commission Rules or implementing an alternative toll plan?

**RECOMMENDATION:** Yes. Based on the testimony in the record, staff believes there is a sufficient community of interest to warrant surveying the Ft. White subscribers for non-optional, two-way EAS to the Gainesville exchange. **(BARRETT)**

**POSITION OF PARTIES**

**SUBSCRIBERS:** Residents with the 497 telephone exchange only seek to call Gainesville, Florida, our community of interest, as a local call, just as the 454 exchange within our same community does. The residents endorse the 25/25 plan.

**ALLTEL:** There is a high volume of calling on this route; however, ALLTEL's data does not indicate whether the calling volumes are being generated by a few customers making a huge number of calls or a large number of customers most of whom are regularly calling from Ft. White to Gainesville.

**BST:** BellSouth does not have traffic data on this route to determine whether a sufficient community of interest exists to justify non-optional EAS as currently defined in Commission Rules.

**STAFF ANALYSIS:** The subscribers of Ft. White overwhelmingly contend that there is a sufficient community of interest to warrant balloting for non-optional EAS to Gainesville. Of the sixteen (16) citizens who testified during the public hearing, all but one supported this initiative. (TR 17) The subscribers stated that EAS was supported with full knowledge that it would require an increase (additive) to their present phone bill. (Peck, TR 12; Griffiths, TR 13; Lance, TR 19; M. Zimmerman, TR 61; Presley, TR 87; Lowery, TR 89; Hollingsworth, TR 91; Riley, TR 93; Farshad, TR 95; Hines, TR 97) Witness E. Zimmerman stated that the additive for EAS to Gainesville would be recovered in just one call, if compared to the cost of being "on hold" for a ten (10) minute period. (TR 85) Witness Hollingsworth, in accepting the idea of an additive, stated "it would be a benefit to us all." (TR 91, 92) Witness Diedeman offered that the additive "beats paying long distance." (TR 95)

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The subscribers' primary community of interest argument was that many of the Ft. White residents use doctors, specialists, or hospital facilities in Gainesville. (Peck, TR 13; Williams, TR 15; Lance, TR 19; George, TR 71; E. Zimmerman, TR 85; Lowery, TR 88; Hollingsworth, TR 91; Riley, TR 93; Diedeman, TR 95; Hines, TR 97) Witness George, the mayor of Ft. White, offered that there are one thousand five hundred (1,500) doctors in Gainesville (TR 71), while witness Zimmerman stated he was "not aware of any in Ft. White." (TR 59) He also stated that the nearest medical facilities to Ft. White residents - aside from Gainesville - are in Lake City, which is twenty three (23) miles away. (TR 60) Subscribers stated that the Lake City facility is a satellite branch of Shands Hospital, with a minimal staff, and "hand-me-down type equipment;" further, any type of specialty care would be referred to Gainesville, where the testing and treatment facilities are much better. (M. Zimmerman, TR 60; George, TR 71-72) Witness George noted that Shands is a widely recognized full medical facility equipped to serve the entire region, and that Gainesville offers three (3) full facility hospitals. (TR 71)

Public witnesses testified to a common frustration of incurring toll charges when "on hold" while trying to reach medical professionals, or others in Gainesville. (Griffiths, TR 13; Lance, TR 19; Lowery, TR 89; Hollingsworth, TR 91; Riley, TR 93) Witness Griffiths referred to calling doctors' offices and getting put on hold as "quite expensive." (TR 13) The same witnesses, plus others, stated that the toll charges were burdensome and that relief would be greatly appreciated. (Griffiths, TR 13; Lance, TR 19; Lowery, TR 89; Hollingsworth, TR 91; Riley, TR 93) A disabled citizen, witness Lowery, stated that getting put on hold for up to thirty (30) minutes is just like "taking half my income." (Lowery, TR 88)

Subscribers argued that other community of interest factors such as educational resources, employment, commerce/shopping and entertainment (including sports, movies, and cultural events) and, specifically, the University of Florida, link Ft. White to Gainesville. (M. Zimmerman TR 60-61; George TR 71-72; E. Zimmerman TR 84-85; Presley TR 86-87; Hollingsworth, TR 91)

Witness Presley, a writer and frequent caller to Gainesville, stated that she uses the research capabilities of the University of Florida. (TR 85) Witness Hollingsworth contended that he utilizes the farming-related research from the University as well. (TR 91) Witness M. Zimmerman estimates that between thirty (30) and fifty (50) percent of Ft. White residents are employed in Gainesville. Witness Diedeman, of Ft. White, stated that none of the major information service providers are accessible via a local call. (TR

95) He indicated that America Online is only available on a dial-up basis by calling two numbers in Gainesville. (TR 95)

Witnesses, including the mayor of Ft. White, correlated the need for non-toll calling to Gainesville with community growth trends and future potential for Ft. White. (Williams, TR 15-16; M. Zimmerman, TR 57; George, TR 67-68; E. Zimmerman, TR 84) Witness George stated that eighty-five percent (85%) of the growth in Columbia County is in the exchange area of Ft. White, the 497 prefix. (TR 67) Witness Williams, a realtor, stated that most buyers are coming out of the Gainesville area and, without toll relief, buyers are reluctant to call her because of the toll charge of calling Ft. White. (TR 14-15) Therefore, she believes that the absence of relief is a "detriment" to her business. (TR 14-15) Witness Lance estimated that sixty percent (60%) of his business is generated from Gainesville. (TR 19) Witness George testified that projections of continued growth cover the next ten (10) to twenty (20) years. (TR 67) He stated it was evident by new housing developments and businesses in the Ft. White area, and that a new high school is also under construction. (TR 67-68) Witness Zimmerman estimated that as many as a thousand (1,000) people could move into the Ft. White area because of the new school. (TR 57) Witness George stated that EAS to Gainesville is "a decided plus" that would make it easier for the school system and businesses in the area to recruit employees and customers from the Gainesville/Alachua County area. (TR 68) As mayor, he stated that he is after "the best deal possible" for the citizens of Ft. White, including EAS to Gainesville. (TR 70)

Subscribers testified that they have modified their telephone behavior as a means of avoiding toll charges for Gainesville calls. (Williams, TR 15; George, TR 67-68) Witness Williams described her 'relay system,' which involved her son who lived in an exchange that had the capability of calling Gainesville without toll charges. (TR 15) Witness George stated that when he was developing his business some years back, he sought out a dedicated/direct line to High Springs in an attempt to reach the Gainesville market, however, it was at a significant expense. (TR 69-70) Rather than develop alternate methods which avoid the toll charges to Gainesville, the witness offered that the subscribers of Ft. White would approve EAS to Gainesville by an eighty-twenty (80/20) margin, if balloted. (George, TR 70)

Witness Zimmerman defined 'the Ft. White community' as "the city of Ft. White area having the 497 exchange (Ft. White) as well as the 454 exchange (High Springs) within southern Columbia County." (TR 55) Witness Coward stated that he has a Ft. White mailing address, a High Springs (454) telephone number, and can

call Gainesville "anytime I want to." He also stated that he shared concerns about the calling scope of High Springs. (TR 20-22) He stated that everyone in Ft. White should be able to call Gainesville toll-free, but also that he should not have to incur a charge to call Lake City, the county seat of Columbia county. (Coward, TR 20-22)

Staff believes that the willingness to secure some form of toll relief demonstrated by these testimonies indicates the high level of interest among subscribers for calls on the Ft. White/Gainesville route. As stated in their brief, the citizens support and endorse the (EAS) 25/25 plan, seeking to call Gainesville, their community of interest, on a non-toll basis. As witness George stated, in the Ft. White community, the EAS issue and Gainesville calling area are "real important to us." (TR 70) As indicated herein, the Ft. White citizens who testified at the public hearing offered numerous examples of their community of interest with Gainesville, contending that it was sufficient to warrant non-optional EAS. Those present and testifying included both residential and business subscribers. The total (signed-in) attendance was forty eight (48), and staff received four (4) mailed in comments.

ALLTEL's witness Eudy stated that because Ft. White/Gainesville is a toll route, an interexchange carrier (IXC) handles the call, not ALLTEL. (TR 38) As a result, the witness concluded that without empirical evidence about the distribution of calls among customers, ALLTEL can make no determination if the route meets the FPSC Rule requirement for community of interest. (TR 39) ALLTEL's witness asserted that there is a high volume of calls on the Ft. White/Gainesville route, as evidenced in the traffic study. (EXH 1, p.2) ALLTEL witness Eudy further stated that ALLTEL cannot determine whether the large volume of calls on the Ft. White/Gainesville route is the result of a few customers making a huge number of calls or a large number of customers regularly calling to Gainesville. (TR 39) The witness went on to state that high Messages per Access Line per Month (M/A/Ms), such as those for Ft. White/Gainesville route, are generally indicative of a high community of interest. (TR 46)

BellSouth's witness Martin stated that BST did not conduct traffic studies, and because the route is interLATA, does not have traffic data available to determine whether a sufficient community of interest exists. (TR 27) Witness Martin did testify that BST would provide two-way EAS from Gainesville if the Commission determines it is warranted. (TR 29) The witness indicated that the agreement was contingent upon full cost recovery. (TR 29)

Staff agrees with the subscribers testimony that the Ft. White/Gainesville M/A/Ms are the result of a large number of subscribers regularly calling Gainesville. When ALLTEL witness Eudy was cross-examined, she stated that she knew of no large business in Ft. White which could skew the M/A/Ms. (TR 45) As evidenced by the testimony, many subscribers use doctors, specialists, or hospital facilities located in Gainesville. Subscribers also argued that they rely on Gainesville for educational resources, employment, commerce/shopping, and entertainment. Staff believes the testimonies heard in the public hearing and summarized herein offer ample evidence that the Gainesville exchange is indeed a community of (great) interest to the citizens of Ft. White. We, therefore, recommend surveying the Ft. White subscribers for non-optional, two-way EAS to the Gainesville exchange.

**ISSUE 2:** If a sufficient community of interest is found to exist, what is the economic impact for the subscribers and the involved companies in implementing an alternative plan on the Ft. White/Gainesville route? (Summarize and discuss in detail the alternative toll plan and its rate structure)

- A) EAS with a 25/25 plan and re-grouping
- B) One-way extended calling service (ECS)
- C) Other (specify)

**RECOMMENDATION:** A) If EAS with the 25/25 plan and regrouping were approved on these routes, the residential rates would increase from \$9.95 to \$12.24, an increase of \$2.29. Business customer's rates would increase from \$24.70 to \$30.93, an increase of \$6.23. If EAS is determined to be appropriate, the Ft. White subscribers should be balloted for non-optional, flat-rate, two-way EAS to the Gainesville exchange. The survey should be conducted in accordance with Rule 25-4.063, Florida Administrative Code. The survey should be conducted within forty-five (45) days of the date the order from this recommendation is issued. ALLTEL should submit the newspaper advertisement for staff's review prior to publication. The survey letter and ballot should be submitted to staff for review prior to distribution to ALLTEL customers. In addition, ALLTEL should provide staff with a copy of the published newspaper advertisement.

If the ballot for EAS with the 25/25 plan is approved, BellSouth should be ordered to submit an application to the FCC for a waiver request pursuant to FCC Order 97-244, and should be ordered to implement EAS on the Ft. White/Gainesville route within twelve (12) months of receiving said waiver.

B) If one-way ECS is approved, the subscribers in the Ft. White exchange would not realize an increase in basic local rates. However, if a customer chose to use ECS, residential customers would be charged \$.25 per call regardless of duration, and business calls would be rated at \$.10 for the first minute and \$.06 for each additional minute. If one-way ECS is found to be appropriate, the Ft. White subscribers should not be balloted. In addition, one-way ECS should be implemented within six (6) months from the issue date of the order.

C) Staff does not support any other plan.

**POSITION OF PARTIES**

- ALLTEL:**
- A) Under EAS with a 25/25 plan and regrouping, ALLTEL's subscribers would pay an additive of \$2.29 for Residential and \$6.23 for Single-line Business. The estimated annual loss to ALLTEL would be \$53,071.
  - B) Under a one-way ECS plan, ALLTEL's Residential subscribers would pay \$0.25 per message, and ALLTEL's business subscribers would pay \$0.10 for the first minute and \$0.06 for each additional minute. The estimated annual loss to ALLTEL would be \$84,078.
  - C) ALLTEL has no position on this part of Issue 2.

- BST:**
- A) Should the Commission determine that EAS is the appropriate method, there would be no impact on the Gainesville subscribers as long as the Commission allows BellSouth to recover its costs. (TR 28)
  - B) Should the Commission determine that one-way ECS or another alternative is the appropriate method, terminating access rates should be charged to the



local exchange carrier completing calls on the same route. (TR 28)

- C) Should the Commission determine that one-way ECS or another alternative is the appropriate method, terminating access rates should be charged to the local exchange carrier completing calls on the same route. (TR 28)

**SUBSCRIBERS:** Residents with the 497 telephone exchange only seek to call Gainesville, Florida, our community of interest, as a local call, just as the 454 exchange within our same community does. The residents endorse the 25/25 plan.

**STAFF ANALYSIS:** The subscribers asserted that they only seek to call Gainesville as a local call, and hence, support the 25/25 plan. The residents of the 497 exchange (Ft. White) strive for equal treatment with the citizens in the southern Columbia County area (High Springs exchange) who have toll-free calling to Gainesville. Citizen statements, as discussed in Issue 1, demonstrate the subscribers' understanding and acceptance of the measures involved to achieve toll-free calling to Gainesville. Specifically, they have acknowledged that there would be an additive on their local bill to achieve this objective (toll-free calling to Gainesville). (Peck, TR 12; Griffiths, TR 13; Lance, TR 19; M. Zimmerman, TR 61; Presley, TR 87; Lowery, TR 89; Hollingsworth, TR 91; Riley, TR 93; Farshad, TR 95; Hines, TR 97) Staff acknowledges that not every citizen supported non-optional EAS to Gainesville, but the overwhelming majority appeared to; balloting subscribers is the most equitable means to quantify customer support.

Staff believes that the Ft. White subscribers should be balloted for non-optional EAS with the 25/25 plan and re-grouping to the Gainesville exchange.

The calculation of the 25/25 additive is based upon twenty-five percent (25%) of the rate group schedule of the exchange to be added (Gainesville). Thus, the 25/25 additive is determined by multiplying twenty-five percent (25%) times the rates in BST's rate group six (VI).

The calculation of regrouping for subscribers is based on the sum of the current calling scope (44,093) and the proposed access

lines (128,559) of the area to be added, Gainesville. This summation yields a new calling scope of 172,652 for the Ft. White subscribers, which is still within the range of ALLTEL's rate group five (V). Therefore, the Ft. White/Gainesville route incurs no regrouping additive.

Under the 25/25 plan, Ft. White subscribers would be balloted at the rates listed in Table A following:

**TABLE A**

|     | PRESENT RATE | 25/25 ADDITIVE | RE-GROUP ADDITIVE | TOTAL OF ADDITIVES | NEW RATE |
|-----|--------------|----------------|-------------------|--------------------|----------|
| R-1 | \$ 9.95      | \$ 2.29        | \$ 0.00           | \$ 2.29            | \$12.24  |
| B-1 | \$24.70      | \$ 6.23        | \$ 0.00           | \$ 6.23            | \$30.93  |
| PBX | \$47.20      | \$10.58        | \$ 0.00           | \$10.58            | \$57.78  |

ALLTEL was the only party in this docket that provided the financial impact if EAS was implemented. Witness Eudy offered that implementation of EAS with a 25/25 plan and regrouping would have an annual impact of \$53,071. (TR 40) The witness stated this amount consists of the foregone revenues from access, billing and collection, and additional costs to be incurred for facilities and directory assistance. (TR 48-49, EXH 1, p. 9)

ALLTEL's calculations assumed a stimulation factor of eight hundred percent (800%). ALLTEL offers that this stimulation factor was higher than the historic stimulation factor of six hundred percent (600%) due to the (expected) high interest among subscribers and expected increased Internet usage. (EXH 1, 10) Staff accepts these estimations as reasonable.

BellSouth's witness Martin stated that BST was willing to implement Ft. White/Gainesville EAS, provided the Company was allowed to recover its costs. (TR 29) The witness further stated that implementation would have no impact on Gainesville subscribers, provided the Company was allowed to recover its costs. (TR 28). If the Commission determines ECS or another form of toll relief is warranted, witness Martin states that BST recommends terminating switched access rates as the appropriate rates for terminating traffic on this route. (TR 29)

If the Commission determines that balloting for EAS is not appropriate, then staff supports the one-way ECS plan. If one-way ECS was implemented, the subscribers in the Ft. White exchange would not realize an increase in basic local rates. However, under one-way ECS, residential customers would be charged \$.25 per call regardless of the duration, and business calls would be rated at \$.10 for the first minute and \$.06 for each additional minute. One-way ECS should be implemented within six (6) months of the issue date of the order.

ALLTEL's witness Eudy estimates the stimulated economic impact with the ECS plan would result in a loss of \$84,078, based upon a two-hundred percent (200%) stimulation. (TR 40, 49, and EXH 1, p.16) ALLTEL used the two-hundred percent (200%) stimulation as the historically accepted figure recognized by the Commission. (Eudy, TR 49)

Staff points out that this stimulation factor differs from the factors discussed for EAS. Staff believes that ALLTEL's assumptions are valid because the calling habits of subscribers would likely differ, depending upon the plan implemented (EAS v. ECS).

Staff has no other alternative toll plan for consideration.

**ISSUE 3:** What are the appropriate rates, charges, or additives, if any, for EAS or for the alternative toll plan on the Ft. White/Gainesville route? If an additive is required, what should the amount be and how long should it remain in effect?

**RECOMMENDATION:** If the Commission adopts staff's recommendation in Issue 1, the appropriate rates, charges, and additives for EAS would be determined under the 25/25 plan with regrouping. The Ft. White subscribers would be balloted for EAS at the rates listed in Table B. Staff recommends the additives remain in place for a four (4) year period, beginning on the date EAS is implemented.

**TABLE B**

|     | PRESENT<br>RATE | 25/25<br>ADDITIVE | RE-GROUP<br>ADDITIVE | TOTAL OF<br>ADDITIVES | NEW<br>RATE |
|-----|-----------------|-------------------|----------------------|-----------------------|-------------|
| R-1 | \$ 9.95         | \$ 2.29           | \$ 0.00              | \$ 2.29               | \$12.24     |
| B-1 | \$24.70         | \$ 6.23           | \$ 0.00              | \$ 6.23               | \$30.93     |
| PBX | \$47.20         | \$10.58           | \$ 0.00              | \$10.58               | \$57.78     |

If the Commission denies staff's recommendation in Issue 1, and one-way ECS is approved, the subscribers in the Ft. White exchange would not realize an increase in basic local rates. Residential customers would be charged \$.25 per call regardless of duration, and business calls would be rated at \$.10 for the first minute and \$.06 for each additional minute. **(BARRETT)**

**POSITION OF THE PARTIES**

**ALLTEL:** For EAS, the proposed additives would be \$4.71 for a residential customer and \$11.79 for business customers and should be permanent. For ECS, the minutes of use rate necessary to recover ALLTEL's cost of implementing the plan is \$.18 per minute, and should be permanent.

**BST:** If EAS is determined to be appropriate, BellSouth should recover its costs. If one-way ECS is determined to be appropriate, BellSouth should charge terminating switched access rates as set forth above.

**SUBSCRIBERS:** No position at this time.

**STAFF ANALYSIS:** ALLTEL asserts that the additives (\$4.71/\$11.79) proposed by the company are rates developed to recover its full cost of implementing flat-rate non-optional EAS. (Eudy, TR 45) The witness further states that the additives discussed in Issue 2 (\$2.29/\$6.23) are appropriate for flat-rate non-optional EAS under the 25/25 plan. Staff agrees with ALLTEL's calculations. The full recovery additives (\$4.71/\$11.79) include forgone revenues

associated with implementing flat-rate, non-optional EAS. The other additives witness Eudy references (\$2.29/\$6.23) mirror staff's calculations for flat-rate non-optional EAS under the 25/25 plan.

From a historical perspective, the Commission has recognized that additives should remain in place for a period of three to four years. ALLTEL witness Eudy stated that she believed the additives should be permanent (TR 40), but agreed that additives historically have remained in place for two (2) to four (4) years. (TR 45) Staff supports the application of these additives for a four (4) year period, beginning on the date flat-rate, non-optional EAS is implemented. We believe that four (4) years is sufficient time for ALLTEL to recover the costs of implementing EAS on the Ft. White/Gainesville route without overly burdening the subscribers who remit the additive to ALLTEL.

BellSouth's witness Martin stated that implementation of any alternative toll plan would have no impact on Gainesville subscribers, provided the Company was allowed to recover its costs. (TR 28). Staff notes that additives, if any, would be imposed upon ALLTEL's (Ft. White) customers, not BellSouth's.

**ISSUE 4:** What dialing pattern should be implemented if the Commission determines that toll relief is appropriate?

**RECOMMENDATION:** Staff recommends that a ten(10)-digit dialing pattern be implemented for the Ft. White/Gainesville route, if the Commission determines that toll relief is appropriate. **(BARRETT)**

**POSITION OF PARTIES**

**ALLTEL:** Ten (10) digit dialing would need to be implemented on this route.

**BST:** BellSouth has no position on this issue.

**SUBSCRIBERS:** No position at this time.

**STAFF ANALYSIS:** ALLTEL's witness Eudy argued that ten(10)-digit dialing is important for a couple of reasons: 1) most efficient

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code utilization, and 2) as a means to effectuate a unique calling pattern. (TR 49-50) Staff agrees with these assertions. With increasing frequency, staff has faced challenges posed by code exhaustion issues and has implemented ten(10)-digit dialing patterns as the most appropriate for inter Numbering Plan Area (NPA) EAS routes.

Staff contends the Ft. White/Gainesville route is interLATA, interNPA, and Ft. White subscribers currently dial eleven (11) digits when calling Gainesville (and vice versa). Staff believes a shift from eleven (11)-digit dialing to ten(10)-digit dialing would minimize confusion for all subscribers. Additionally, staff offers that ten(10)-digit dialing is consistent with area code relief plans which involve overlays and would forego the possibility of again changing the dialing from seven (7)-digits to ten(10)-digits at a future date. Staff recommends that ten(10)-digit dialing is appropriate on the Ft. White/Gainesville route.

**ISSUE 5:** Should this docket be closed?

**RECOMMENDATION:** If the Commission determines that the Ft. White subscribers should be surveyed for EAS, then this docket should remain open pending the outcome of the survey. If the Commission determines that one-way ECS is appropriate, then this docket should be closed and staff should ensure that ALLTEL and BST file appropriate tariffs. If the Commission denies staff's recommendation in Issue 1 and determines that no toll relief is warranted on this route, this docket should be closed.

**(B. KEATING)**

**STAFF ANALYSIS:** If the Commission determines that the Ft. White subscribers should be surveyed for EAS, then this docket should remain open pending the outcome of the survey. If the Commission determines that one-way ECS is appropriate, then this docket should be closed and staff should ensure that ALLTEL and BST file appropriate tariffs. If the Commission denies staff's recommendation in Issue 1 and determines that no toll relief is warranted on this route, this docket should be closed.