

ALLTEL COMMUNICATIONS

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Bettye J. Willis

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ORIGINAL

August 8, 2000

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

Re: Comments in Docket No. 990994-TP

Dear Mrs. Bayo:

Enclosed is an original and fifteen copies of ALLTEL Communications, Inc.'s comments in response to the proposed rule revisions in the above docket, which we ask that you file.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Bettye J. Willis
Bettye J. Willis

Cc: All Parties of Record
Harriet Eudy
Darrell Mennenga
Steve Messer
Bob Priebe

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FPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Amendments to Rule 25-4.003,)
F.A.C., Definitions; 25-4.110, F.A.C., Customer)
Billing for Local Exchange Telecommunications)
Companies; 25-4.113, F.A.C., Refusal or)
Discontinuance of Service by Company; Rule)
25-24.490, F.A.C., Customer Relations; Rules)
Incorporated; And 25-24.845, F.A.C., Customer)
Relations; Rules Incorporated)
_____)

Docket No. 990994- TP

Filed: August 8, 2000

Comments of ALLTEL Communications, Inc.

ALLTEL Communications, Inc. ("ALLTEL") provides the following comments on the above proposed rule changes. We concur in FCCA's positions with regard to these rules and additionally submit the following comments with respect to the application of Rule 25-4.113 to ALECs.

Introduction

ALLTEL Communications, Inc. is a competitive telecommunications provider offering alternative local service in both the residential and business markets. In general, in a competitive marketplace, the major difference between ALLTEL's ALEC product (dial tone) and our Competitors product (dial tone) is the way we price it, package it, promote it, and support it. All of these items culminate with the end user bill. Pricing, Packaging, and Promotion (i.e. Bundles) give us a competitive edge and to a large degree determine how we present items on the bill. If our promotion is a pricing package that contains local service, vertical features, voicemail, internet and a block of LD and Cellular minutes for a single flat monthly rate, that *rate* is what the customer expects to see on the bill. To the extent that we have to alter our billing for further regulatory mandates, our ability to compete is diminished. In the competitive marketplace of

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FPSC-RECORDS/REPORTING

ALECs, the customer market should determine if our billing format and presentation is satisfactory and meets their needs. If our billing font is too large or too small, if we provide too much information or too little information, if the customer does not like our business practices, or if the customer simply does not prefer the appearance of our bill, they have alternatives in a competitive market. All of this is said simply to point out the fact that burdensome rules and regulation work to impede competition not encourage it.

Applicability of Rule 25-4.113 to ALECs

ALLTEL does not believe this rule should be applicable to ALECs. As an ALEC, we do not have Eligible Telecommunications Carrier (ETC) status. We do not receive State or Federal Universal Service Funding. We only serve customers to the extent of our technical capability. We do not hold a monopoly franchise and we are *NOT* the "carrier of last resort". Customers subscribe to our service because they want the services we provide at the rates we charge, not because they have to in order to have phone service. Part of our ability to offer competitive products at competitive prices is contingent on our ability to control costs. As such, if a subscriber is indebted to our company, for whatever reason, we should have the flexibility to terminate all services to that subscriber.

In the alternative, at a minimum, if we offer a Bundled package containing both regulated and deregulated items at a discounted price and if the customer accepts this package, then we should be able to disconnect the customer if they do not pay for the entire bundle.

While ALLTEL believes the application of these rules to ALECs is contrary to the goal of increasing local competition, should these rules be enacted, we would have the following concern:

Timing: Implementing these billing rules in our ALEC billing system would be prohibitively expensive. In order to provide the ALEC customer with the billing functionality that they want/require (i.e. a single bill including Cellular services) we would have to design and develop certain program enhancements. These changes would be very expensive, would require significant time to complete, and would be a deterrent to local competition.

Whereas ALLTEL concurs in the position of FCCA with respect to the application of the billing rules to ALECs and provides additional comments, we believe the application of these rules to ALECs would be unduly burdensome and expensive, while providing no real benefit to customers in a competitive marketplace.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Comments have been furnished by (*) hand delivery or U.S. mail this 8th day of August 2000 to the following:

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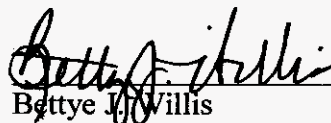
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