Eric Fryson

From:	Ann Bassett [abassett@lawfla.com]
Sent:	Wednesday, March 14, 2012 2:48 PM
То:	Filings@psc.state.fl.us; Judy Harlow
Cc:	Floyd Self; Richard_Wolfe@cable.comcast.com
Subject:	Docket No. 110303-OT
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Attachments: 2012-03-14, 110303, Comcast's Response to Staff's Survey.pdf

The person responsible for this electronic filing is:

Floyd R. Self Messer, Caparello & Self, P.A. P.O. Box 15579 Tallahassee, FL 32317 (850) 222-0720 <u>fself@lawfla.com</u>

The Docket No. is 110303-OT – Review of Agency Rules in Effect on or before November 16, 2010

This is being filed on behalf of Comcast Business Communications, LLC d/b/a Comcast Long Distance and Comcast Phone of Florida, LLC d/b/a Comcast Digital Phone d/b/a CIMCO, a division of Comcast Business Services

Total Number of Pages is 3

Comcast's Responses to Staff's Survey

Ann Bassett Legal Assistant to Floyd R. Self and Norman H. ("Doc") Horton, Jr. Messer, Caparello & Self, P.A. 2618 Centennial Place Tallahassee, FL 32308

850-201-5225 (direct phone) 850-224-4359 (fax)

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MESSER CAPARELLO & SELF, P.A.

Attorneys At Law www.lawfla.com

March 14, 2012

BY ELECTRONIC FILING

Judy Harlow c/o Ann Cole Commission Clerk Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 110303-OT

Dear Ms. Harlow and Ms. Cole:

Enclosed for filing on behalf of Comcast Business Communications, LLC d/b/a Comcast Long Distance and Comcast Phone of Florida, LLC d/b/a Comcast Digital Phone d/b/a CIMCO, a division of Comcast Business Services, is the response to the survey questions regarding Rule 25-4.0161, Florida Administrative Code in the above referenced docket.

Thank you for your assistance with this filing.

Sincendy, Floyd R. Self

FRS/amb Enclosure cc: Mr. Richard Wolfe

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Regional Center Office Park / 2618 Centennial Place / Tallahassee, Florida 32308 Mailing Address: P.O. Box 15579 / Tallahassee, Florida 32317 Main Telephone: (850) 222-0720 / Fax: (850) 224-4359

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Rule 25-4.0161, F.A.C. Page 1

Rule 25-4.0161, F.A.C. - Survey Questions

The following survey questions apply to Rule 25-4.0161, F.A.C., Regulatory Assessment Fees; Telecommunications Companies. For responding to these questions, please refer to Subsection 120.541(2), F.S., and Subparagraph 120.745(1)(b)2, F.S. "Transactional costs" are defined in Subparagraph 120.541(2)(d), F.S., as:

...direct costs that are readily ascertainable based upon standard business practices, including filing fees, the cost of obtaining a license, the cost of equipment required to be installed or used or procedures required to be employed in complying with the rule, additional operating costs incurred, the cost of monitoring and reporting, and any other costs necessary to comply with the rule.

The company's response data to these survey questions should be provided for the entire rule, unless the response data is available by rule section, in which case we request the response data be provided by rule section. Please present data in annualized format, if possible, and all cost or benefit dollar estimates should be stated in nominal terms.

1. What are the estimated transactional costs resulting from the Company's compliance of Rule 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

a. What are your actual transactional costs resulting from your Company's compliance with Rule 25-4.0161, F.A.C., for the period July 1, 2011 through December 31, 2011?

Comcast's Response: Negligible

2. What is your estimate of the likely impact, stated in terms of costs and/or benefits, on small businesses (as defined by Section <u>288.703</u>, F.S.) located in the Company's service territory, resulting from the compliance of Rule 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

Comcast's Response: Negligible

3. What is your estimate of the likely impact, stated in terms of costs and/or benefits, on small counties and small cities (as defined in Section <u>120.52</u>, F.S.) located in the Company's service territory, resulting from the compliance of 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

Comcast's Response: Negligible

4. What is your estimate of the likely impact, stated in terms of costs and/or benefits, on entities located in the Company's service territory other than those specifically identified in Questions 2 and 3, resulting from the compliance of 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

Comcast's Response: Negligible

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5. What expected impact do you believe Rule 25-4.0161, F.A.C., will have on economic growth, private sector job creation or employment, and private sector investment for the five year period July 1, 2011 in the Company's service territory?

Comcast's Response: Negligible

6. What expected impact do you believe Rule 25-4.0161, F.A.C., will have on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets, productivity, and innovation, for the five year period July 1, 2011?

Comcast's Response: Negligible

7. What are the benefits to your Company associated with Rule 25-4.0161, F.A.C.?

Comcast's Response: A 20% reduction of the fee assessment basis.

8. Since the December 4, 2011 rule change has your Company revised customer rates in order to comply with Rule 25-4.0161, F.A.C.? If so, please explain any rate changes that were made.

Comcast's Response: No.

9. If the Company did revise customer rates after the rule change, what were the specific costs associated with processing and implementing these rate changes?

Comcast's Response: N/A

10. Does the Company anticipate having to revise customer rates in the future in order to comply with Rule 25-4.0161, F.A.C.? If so, please explain any anticipated rate changes for the five year period beginning July 1, 2011.

Comcast's Response: No.

11. If the company anticipates revising customer rates in order to comply with Rule 25-4.0161, F.A.C., what costs does the company expect to incur to process and implement the rate changes for the five year period beginning July 1, 2011?

Comcast's Response: N/A