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**ORIGINAL
FILE COPY**

August 9, 1991

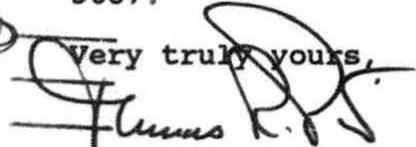
Mr. Steve C. Tribble, Director
Division of Records & Reporting
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32399-0865

Dear Mr. Tribble:

Re: **Docket No. 910060-TP**
Amendment of Rule 25-4.110, F.A.C.,
pertaining to customer billing

Please find enclosed the original and 15 copies of GTE Florida Incorporated's Comments for filing in the above stated matter.

ACK Service has been made as indicated on the attached Certificate of Service. If there are any questions with regard to this matter, please contact the undersigned at (813) 228-3087.

Very truly yours,


Thomas R. Parker

TP:fm
Enclosures

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FPSC-BUREAU OF RECORDS

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08074 AUG -9 1991

FPSC-RECORDS/REPORTING

GTE Florida Incorporated
GTE South Incorporated
A part of GTE Corporation

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of the Attorney)
General and the Public Counsel to) Docket No. 910060-TP
adopt rules governing 900 services) Filed: 8-9-91

COMMENTS OF GTE FLORIDA INCORPORATED

GTE Florida Incorporated ("GTEFL") hereby submits its comments in Phase I of the above-referenced proceeding. GTEFL understands this first phase of the proceeding to address only the Staff's proposed amendments to F.A.C. §25-4.110(1)(a), as revised by Staff at the July 31, 1991 hearing. Brown/Staff, Tr. 10-11. In addition to discussing its views on Staff's proposal, GTEFL will respond herein to requests for information directed to it by Public Counsel and the Office of the Attorney General at the hearing.

As stated in its Request for Hearing, GTEFL supports the amendments' intended goal of ensuring adequate customer notification of rights with regard to 900 and 976 charges. GTEFL Comments and Request for Hearing, May 31, 1991, at 1. GTEFL will not oppose the substantive aspects of the proposal. Rather, these comments re-emphasize GTEFL's position that billing system limitations will prevent compliance with the amended rule until the spring of 1992.

The Staff's proposal requires segregation of local and "regular" long distance charges from 900 and 976 charges, to be

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placed under their own descriptive heading. GTEFL's current billing system simply does not have the capacity -- either actual or potential -- to separate 900/976 charges from other toll charges. Although efforts are underway to initiate a new and more sophisticated billing system across the entire GTE system, this is a complex and necessarily protracted process. Further, plans for the new system did not originally include an accommodation for segregation of 900/976 charges. This change will need to be implemented after the improved system is in place.

GTEFL believes that some parties, particularly the Office of the Attorney General, may not have a sufficient appreciation for the complexity inherent in modification of LEC billing systems. Mr. Poag's description of the nature and extent of the tasks involved accurately captured the difficulty of the process. Poag/United, Tr. 85-87. Since GTEFL's new billing system will serve companies in 31 states, changes in one state's billing format will further complicate matters.

The frequency and placement of notification of the "no disconnect" and blocking notices proposed by the Staff may also become a concern for GTEFL, depending on the ultimate interpretation of the proposal. The current version of the amendments would require notification "on the section of the bill containing 900 or 976 service charges." Notice of Rulemaking at 1, as revised by Staff at Tr. 11. While this language requires placement of the notices in the 900/976 section, it does not specify

where in the section the notice must occur, nor does it mandate more than a single notice within the bill. GTEFL supports the amendment, insofar as it leaves to the company the discretion to place the required notice at a single point in association with the 900/976 charges.

Statements by the Public Counsel and the Office of the Attorney General at the hearing, however, seemed to favor expansion of the amendments to require multiple notices within a single bill and/or explicit instructions as to placement of the notification(s). To this end, Mr. Twomey asked GTEFL to provide information as to the current billing system's ability to print the required notification on every bill page containing 900/976 charges, while Mr. McLean asked the same question with respect to placing a notification on every page of the bill. Tr. 75. GTEFL has obtained answers to these inquiries.

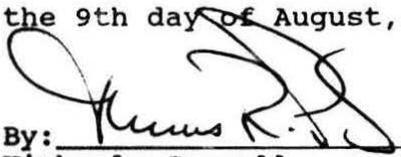
The only solution GTEFL can provide in the near term is the presentation of a five line bill message phrase on the summary page of every bill. This phrase would appear regardless of whether the customer incurred any 900 charges for that billing cycle. GTEFL cannot provide the bill phrase on every single page of the bill or on just those pages which contain 900 charges. GTEFL will be able to conform to any of the foregoing scenarios when it converts to its new billing system in 1992.

Even aside from considerations of technical difficulty in printing multiple notices within one bill, any such requirement would be imprudent as a policy matter. In addition to the expense of system modification, numerous notices would needlessly increase the size of the bill and, in turn, postage and paper costs. Despite Mr. Twomey's indications that it is better to err on the side of too much education, Tr. 71-72, it is best not to err at all. GTEFL submits that a once-per-bill notification strikes the appropriate balance in effectively informing customers of their rights without unduly burdening the billing companies. Indeed, other options -- such as printing the required notices on pages of the bill where no 900/976 charges appear -- would likely provoke customer confusion.

Perhaps most importantly, modification of GTEFL's current billing system to generate any bill notices would waste resources better directed elsewhere. Because of GTEFL's conversion to the new billing system, additional expenditures of time or money on the old system would be imprudent and of limited value. If the Commission requires GTEFL to update its current system, the company will need to make billing modifications twice -- once for the old system, and then again when the new system is implemented. See GTEFL's Request for Hearing at 2.

In summary, GTEFL believes its position in this proceeding is entirely reasonable. GTEFL supports the Staff's proposed amendments, as interpreted herein. If the revised rule is adopted, the company will make every effort to comply with it at the earliest possible date. Because a transition period will be necessary to complete the work needed to enable segregation of 900 and 976 charges from other charges, GTEFL would request at least until March of 1992 to implement the necessary changes in its new billing system. In addition, GTEFL believes that any directive requiring modifications to its current billing system would be inconsistent with ratepayer interest in efficient operation and wise deployment of company resources.

Respectfully submitted this the 9th day of August, 1991.

By: 

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of GTE Florida Incorporated's Comments in Docket No. 910060-TP has been furnished by U.S. mail on the 9th day of August, 1991, to the parties on the attached list.

A handwritten signature in black ink, appearing to read 'Thomas R. Parker', written over a horizontal line.

Thomas R. Parker

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