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GTE Florida Incorporated

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September 3, 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:

Docket No. 90095

Re:

ACK AFA		Amendment of 25-4.107, F.A.C., Information to Customers, and Rule 25-4.108, F.A.C., Initiation of Service pertaining to extended payment plans for the payment of service connection charges
APP	1	Please find enclosed the original and 15 copies of GTE
CAF		Florida Incorporated's Comments for filing in the above- stated matter.
CMD		
CTR		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
EAG		
LEG		_(813) 228-3094.
LIN	6	-Very truly yours,
OPC		- W 1 1 1 1 100
RCH	1	- Trulialy Candle
SEC	1	_Kimberly Caswell
WAS		-KC:tas
OTH	-	_Enclosures

RECEIVED & FILED

FPSC BUREAU OF RECORDS
GTE Florida Incorporated
GTE South Incorporated
A part of GTE Corporation

DOCUMENT NUMBER-DATE
08758 SEP -3 1991
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION



IN RE: Amendment of 25-4.107, F.A.C.,) Information to Customers, and Rule 25-4.108, F.A.C., Initiation of Service pertaining to extended payment) Filed: September 3, 1991 plans for the payment of service connection charges

Docket No. 900959-TP

COMMENTS OF GTE FLORIDA INCORPORATED

GTE Florida Incorporated ("GTEFL") hereby submits its comments on the final version of the proposed rules in the abovereferenced docket.

In its initial comments in this proceeding, GTE Florida Incorporated ("GTEFL") pointed out that there is no evidence to support institution of rules mandating blanket notification of an extended payment plan. Carriers' current notification procedures are reasonable and continue to work well. Adoption of the proposed rules would impose significant, unjustified costs upon telephone companies and their customers.

Should the Commission, however, adopt some form of new notification rule, GTEFL concurs in United's substitute language for Rule 25-4.107. That language would trigger notification when a customer indicates an inability to pay or requests payment terms. See United Post Hearing Comments at 6-7. This qualifier assures notification to those individuals who truly need a payment plan, without unduly raising the LECs' costs. Without language such as that proposed by United, there is simply no way to ensure that customers will not opt for time payment simply to gain the time value of money.

> DOCUMENT NUMBER-DATE 08758 SEP -3 1991 FPSC-RECORDS/REPORTING

Respectfully submitted this 3rd day of September, 1991.

JAMES V. CARIDEO THOMAS R. PARKER JOSEPH W. FOSTER KIMBERLY CASWELL

KIMBERLY CASMELL

GTE Florida Incorporated P. O. Box 110, M.C. 7 Tampa, Florida 33601-0110 Telephone No. (813) 228-3087

Attorneys for GTE Florida Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the Comments of GTE Florida Incorporated in Docket No. 900959-TP was furnished by U.S. mail on the 3rd day of September, 1991, to the parties on the attached list.

Kimberly Caswell

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