

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
FILE COPY

In re: Application for a rate )  
increase by United Telephone )  
Company of Florida. )  
)  
)  
In re: Petition by Bonita )  
Springs residents for extended )  
area service between Bonita )  
Springs and the Fort Myers and )  
Naples Exchanges. )  
)  
)  
In re: Request by Pasco County )  
Board of County Commissioners )  
for extended area service between )  
all Pasco County Exchanges. )  
\_\_\_\_\_ )

Docket No. 910980-TL

Docket No. 910027-TL

Docket No. 910529-TL

Filed: August 10, 1992

PETITION OF UNITED TELEPHONE COMPANY OF FLORIDA

United Telephone Company of Florida (hereinafter "United") pursuant to the provisions of Florida Public Service Commission (hereinafter "FPSC") Rule 25-22.036, Florida Administrative Code, files this Petition protesting that portion of the Proposed Agency Action contained in FPSC Order No. PSC-92-0708-FOF-TL (the Order) issued in the above captioned Dockets implementing a \$.25 message rate call plan on intercompany routes between Williston and Gainesville and Trillachoochee and Brooksville. In support thereof, United states as follows:

1. The exact name of the Petitioner and the address of its principal business office is:

United Telephone Company of Florida  
P. O. Box 5000  
Altamonte Springs, Florida 32716-5000

DOCUMENT NUMBER-DATE  
08898 AUG 10 1992  
FPSC-RECORDS/REPORTING

2. The name and address of the person authorized to receive notice and communications in respect to this Petition is:

Alan N. Berg  
United Telephone Company of Florida  
P. O. Box 5000  
Altamonte Springs, Florida 32716-5000

3. United is a telecommunications company as that term is defined in Section 364.02(7), Florida Statutes (1991). As such its regulated intrastate operations are subject to the jurisdiction of the FPSC. This Petition protests the Proposed Agency Action contained in the Order implementing the \$.25 message rate calling plan on the intercompany routes from Williston to Gainesville and Trillachoochee to Brooksville.

4. United's protest is restricted to one matter -- the lack of provision of time for implementation of the \$.25 message plan after the Proposed Agency Action becomes effective.

United is unable to implement the changes required in the Proposed Agency Action instantaneously, and will be in violation of the Order unless it implements the changes required at the time the Order becomes final.

United will withdraw this Petition if an adequate time for implementation can be provided. The lack of provision of time for implementation will have a substantial effect on United.

5. The disputed issue of material fact in regard to this Petition is: The Order fails to provide time for implementation of the actions required by the Proposed Agency Action portion of the Order. Other issues may be raised by other parties in response to the Proposed Agency Action, and United reserves the right to respond to those issues.

6. The ultimate facts alleged by United are: The Order contains Proposed Agency Action, which requires United to implement a \$.25 message rate calling plan on the intercompany routes between Williston and Gainesville and Trillachoochee and Brooksville. The sections of the Order in question provide no time period for such implementation, and would require United to implement the required changes instantaneously upon the Proposed Agency Action section of the Order becoming final. United must determine if existing facilities are adequate, add facilities if necessary, devise a method of recording such calls which will assure proper rating, change the rating for calls in its billing system, change its treatment of such calls from privately owned pay telephones from toll to local and test the changes for accuracy and reliability. United estimates that it can make these changes on or before September 12, 1992 on the Williston to Gainesville route and on or before October 17, 1992 on the Trillachoochee to Brooksville route. It is United's understanding that these are the same dates that Southern Bell Telephone & Telegraph Company will be able to implement the \$.25 calling plan on these routes. United is unable to implement the changes required in the Proposed Agency Action instantaneously, and will be in violation of the Order unless it implements the changes required at the time the Order becomes final.

United has begun the process of implementing such changes in anticipation that no other affected party will protest the Proposed Agency Action, but cannot expend substantial funds for reprogramming and other implementation steps until the Proposed Agency Action is final.

7. The specific relief being sought by United is the provision of the implementation periods described above to implement and test the changes required by the Proposed Agency

Action portion of the Order. If this matter can be resolved without a hearing, United will withdraw this Petition.

WHEREFORE, United requests that the Proposed Agency Action sections of FPSC Order No. PSC-92-0708-FOF-TL be modified to allow until September 12, 1992 to implement the \$.25 message rate calling plan on the Williston to Gainesville route, and until October 17, 1992 on the Trillachoochee to Brooksville route. If this matter can be resolved without a hearing United will withdraw this Petition.

Respectfully submitted,



Alan N. Berg  
Senior Attorney  
United Telephone Company of Florida  
P. O. Box 5000  
Altamonte Springs, Florida 32716-5000  
(407) 889-6018

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of United Telephone Company of Florida's Petition has been furnished by U.S. Mail or hand-delivery to the following parties this 10th day of August, 1992:

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