

921074

REBUTTAL TESTIMONY

- 1 Q. Please state your name, employer and address.
- 2 A. John Carroll. I am employed as Director of Revenue
- 3 Requirements and Regulatory Affairs for Northeast
- 4 Florida Telephone Company, 130 N. Fourth Street,
- 5 Macclenny, Florida 32063-0485.
- 6 Q. What experience have you had in the telecommunications
- 7 industry?
- 8 A. I have worked for the Public Service Commission, the
- 9 Office of the Public Counsel, General Telephone Company
- 10 of Florida, and Northeast Florida Telephone Company,
- 11 and I have handled many matters for LECs as a
- 12 consultant. I have previously testified before the
- 13 Commission on numerous occasions.
- 14 Q. On whose behalf are you presenting rebuttal testimony?
- 15 A. I am presenting rebuttal testimony on behalf of my
- 16 company, Northeast Florida Telephone Company. I am
- 17 also here to represent the positions of Indiantown
- 18 Telephone System, Quincy Telephone Company and
- 19 Southland Telephone Company. All four of the companies
- 20 have similarities that permit combining testimony to
- 21 avoid repetition. Nevertheless, in the event that
- 22 individual company facts are needed, information could
- 23 be furnished by the companies involved.
- 24 Q. In what way are the four companies on whose behalf you
- 25 are testifying similar?

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1           A.    Each of the companies has fewer than 12,000 access  
2                    lines and annual gross revenues of less than  
3                    \$8,000,000.  Each company serves a rural area without  
4                    any areas of highly concentrated subscribers that would  
5                    be likely to attract competitive access providers, even  
6                    though there is always the potential for a single high  
7                    usage subscriber in any area.

8           Q.    What are some of the similarities and differences  
9                    between those companies you represent and the Tier 1  
10                    LECs which are subject to the FCC's order on expanded  
11                    interconnection?

12          A.    There is, of course, an enormous difference in size,  
13                    since the Tier 1 companies have annual revenues in  
14                    excess of \$100,000,000 per year.  There is,  
15                    consequently, a great disparity in the quantity of  
16                    service provided, even though the smaller companies  
17                    believe that they provide a similar quality of service.  
18                    The small, rural LECs can provide current technology  
19                    but generally do not find themselves in a highly  
20                    competitive environment.  For example, even though the  
21                    small, rural LECs have long been equal access capable,  
22                    some have only recently received a request for equal  
23                    access.

24          Q.    Have you taken a position on most of the issues which  
25                    were established for this docket?

1           A.    Yes.  Our positions were set forth in our prehearing  
2                   statement, and I adopt those positions as if they were  
3                   specifically set forth in this testimony, including the  
4                   basic position that it would be contrary to the public  
5                   interest to impose a requirement on the four small,  
6                   rural LECs to permit physical collocation under the  
7                   same circumstances imposed on LECs with vastly greater  
8                   annual revenues, urban service areas and immediate  
9                   competitive pressures.

10          Q.    Has any witness suggested that small, rural LECs be  
11                   treated exactly like the Tier 1 LECs?

12          A.    Yes.  Paul Kouroupas, Teleport Communications Group, an  
13                   AAV, made such a suggestion on page 18 of his direct  
14                   testimony.  I dispute the validity of such an approach.  
15                   Instead, the Commission should be vigilant to insure  
16                   that the four small, rural LECs are not given a mandate  
17                   like the Tier 1 LECs, if doing so would tend to  
18                   disadvantage rural subscribers through pressures to  
19                   raise local rates or would in any way adversely affect  
20                   the goal of achieving universal service.  As stated by  
21                   GTE's witness, Edward Beauvais, on pages 20 and 21 of  
22                   his direct testimony, "... benefits realized by the  
23                   large players will be at the expense of the smaller  
24                   ones, the rural and residential customers.  If the  
25                   large urban business customers discontinue LEC tariffed

1 services and substitute interconnectors' services,  
2 inherent contributions/subsidies which benefit rural  
3 and residential customers will be lost."

4 Q. Do you see any other problems that might arise if small  
5 rural LECs are required to provide expanded  
6 interconnection for intrastate access when the FCC has  
7 not required such interconnection for interstate  
8 access?

9 A. Yes. Different approaches in the interstate and  
10 intrastate jurisdictions could create policing problems  
11 and increase administrative burdens.

12 Q. Does this conclude your testimony?

13 A. Yes.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the Rebuttal Testimony in Docket No. 921074-TP of Indiantown Telephone System, Inc., Northeast Florida Telephone Company, Quincy Telephone Company and Southland Telephone Company has been sent by U. S. Mail this 8th day of July, 1993, to the following parties of record:

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