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GTE FLORIDA INCORPORATED

REBUTTAL TESTIMONY OF DENNIS B. TRIMBLE

DOCKET NO. 960980-TP **960847**

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND TITLE.

A. My name is Dennis B. Trimble. My business address is 600 Hidden Ridge Drive, Irving, Texas, 75015.

Q. ARE YOU THE SAME DENNIS B. TRIMBLE WHO FILED REBUTTAL TESTIMONY IN DOCKET 960847-TP, THE ARBITRATION BETWEEN GTE AND AT&T?

A. Yes. That testimony was filed on September 24, 1996.

Q. WHAT WAS THE PURPOSE OF THAT EARLIER-FILED TESTIMONY?

A. Through that testimony, I explained why the default proxy rates established by the FCC are inappropriate for consideration by the Commission in Florida. Because that testimony also applies to MCI's petition for arbitration, I am adopting the rebuttal testimony filed in Docket 960847-TP in this docket as well. However, MCI also raised an additional issue which I address below.

Q. WHAT INTRASTATE ACCESS CHARGES, IF ANY, SHOULD BE COLLECTED ON A TRANSITIONAL BASIS FROM CARRIERS

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WHO PURCHASE GTEFL'S UNBUNDLED LOCAL SWITCHING ELEMENT?

A. GTEFL will assess a per minute charge to the ALEC for all traffic switched by GTEFL (local, intraLATA toll, and interexchange - both intra- and interstate). For calls that "traverse" an unbundled local switching element (i.e., port) that was purchased by the ALEC and would incur access charges in today's environment, GTEFL will assess the local switching rate plus CCL and RIC. These charges should not be referred to "access charges;" rather they are local switching charges that provide continued contributions in lieu of access charges. They do not alter the ALEC's right/obligation to assess access charges. The ALEC will be responsible for assessing access charges on the IXC. Note that for calls that do not traverse an unbundled port, full switched access rates will apply.

The FCC notes that application of these elements is intended to provide continued contribution to universal service and local service rate support objectives. Therefore, application of the rates should continue at their currently tariffed levels and not at the diminished levels contained in the FCC *First Report and Order*. To do so would be ratemaking in an arbitrary and capricious manner, as no justification has been provided for applying only 75% of the RIC and GTEFL has not been provided any rate relief on those rates currently enjoying the benefits of contribution from access charges.

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Q. HOW LONG SHOULD ANY TRANSITIONAL PERIOD LAST?

Application of these rate elements should continue until a "reassignment" of revenues associated with these elements to appropriate rate elements is fully addressed. This is likely to occur through access reform, universal service and some form of rate rebalancing. GTEFL fully supports efforts to rationalize all rates, including local and access. It is our belief that only when rates have been fully rationalized can the magnitude of the funding issues associated with public policy choices be identified and dealt with. Further, GTEFL believes that funding of these public policy choices must be accomplished in a competitively neutral manner.

Q. DOES THAT CONCLUDE YOUR TESTIMONY?

A. Yes, it does.