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July 13, 1998

Blanca Bayo  
Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

In re: Docket No. 980478-TL

Dear Ms. Bayo:

Frontier herewith files its Supplement to its Petition for Rule Waiver to expand upon its allegations in the original petition by providing certain substantiating factual information. I indicated in my letter dated June 4, 1998, waiving the provisions of Section 120.542(8), Florida Statutes, that this Supplemental Petition would be forthcoming.

Sincerely,



David B. Erwin

DBE:jm  
Copy to:

Will Cox, Attorney, FPSC  
Kelly Goodnight, Frontier

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CML  *Daler*
- CTR \_\_\_\_\_
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Rule Waiver )  
by Frontier Communications of )  
the South )  
\_\_\_\_\_ )

Docket No.: 980478-TL

Filed: July 13, 1998

**SUPPLEMENT TO PETITION  
FOR RULE WAIVER**

Frontier Communications of the South, Inc. (Frontier), hereby files this Supplement to the Petition for Rule Waiver previously filed April 2, 1998, in Docket No. 980478-TL. Frontier believes that it would be appropriate to expand upon its allegations in the original petition that failure to grant the petition for waiver would create a "substantial hardship" and that granting the petition would not do violence to the concept that waivers should be granted only where the underlying purpose of the statute will be achieved by other means. Consequently, Frontier submits the following supplemental information:

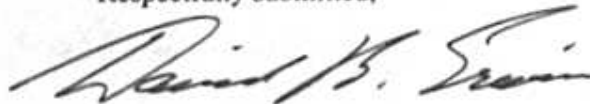
1. If Frontier is allowed to wait for Siemens Stromberg Carlson Release Level 22 for its switch, then the procedures set forth in paragraph 2, below, could be avoided.
2. If Frontier is not allowed to wait for and use Release 22, Frontier would face initiating and maintaining cumbersome and complicated manual procedures of questionable efficacy that might create a different set of problems, such as incorrect toll billing, in order to attempt to comply with the rule for which waiver has been sought. Frontier would have to undertake the following procedures for each customer involved:
  - a) Temporary disconnects will require the disconnected number to be assigned a new screen class. The old screen class must be recorded and reused when the directory number is placed back into service. Termination barred must be placed on the disconnected number to prevent

incoming calls on each temporary disconnected line. All features must be recorded before the customer's line is temporarily disconnected, because some features (such as caller name and number, 3-way calling, code restriction and other class features) must be removed from the line as a result of software conflicts that arise when placing termination barred on the line.

- b) Accurate records must be retained for each customer's line, because all line neumerics must be put back on each customer's line when full service is restored. Failure to do this will result in features not working properly, with toll possibly being billed incorrectly on the customer's phone number.
- c) For the billing cycle ending May 20, 1998, Frontier had 63 disconnects. If Frontier were to attempt a front end work around (not necessary with Release 22), it would require approximately 4.0 man hours of work per customer and an additional .25 man hours to reestablish the connection. This process, even if it did not create unintended adverse consequences, would be expensive and disruptive.

3. Frontier submits that granting the petition would allow the underlying purpose of the statute to be achieved by reasonable means, at a reasonable cost, without creating unintended consequences and possible unintended departures from tariff provisions or other rule or statutory requirements. Frontier submits that the provisions of Section 120.542(2), F.S., were not intended by the Legislature to create problems through a legalistic and unreasonable application of the law. Rather, the intent of the statute would appear to be a removal of burdensome or technically difficult or impossible requirements, as sought by the petition for waiver in this case.

Respectfully submitted,



David B. Erwin