



# Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

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RECORDS AND REPORTING

**DATE:** APRIL 22, 1999

**TO:** DIRECTOR, DIVISION OF RECORDS AND REPORTING (B) *DES*

**FROM:** DIVISION OF APPEALS (CALDWELL) *duc*  
DIVISION OF COMMUNICATIONS (AUDU) *af*

**RE:** DOCKET NO. 990157-TL - IN RE: PETITION OF GTE FLORIDA INCORPORATED FOR DECLARATORY STATEMENT THAT ITS INTRALATA CUSTOMER CONTACT PROTOCOL COMPLIES WITH ORDER NUMBER PSC-95-0203-FOF-TP *AD*

**AGENDA:** MAY 4, 1999 - REGULAR AGENDA - DECISION ON DECLARATORY STATEMENT - PARTICIPATION IS LIMITED TO COMMISSIONERS AND STAFF

**CRITICAL DATES:** MAY 11, 1999 - SECTION 120.565(3), F.S., REQUIRES AN AGENCY TO ISSUE A DECLARATORY STATEMENT OR DENY THE PETITION WITHIN 90 DAYS AFTER THE FILING OF THE PETITION.

**SPECIAL INSTRUCTIONS:** NONE

**FILE NAME AND LOCATION:** S:\PSC\APP\WP\990157.RCM

### CASE BACKGROUND

Pursuant to Section 120.565, Florida Statutes, and Rule 28-105.002, F.A.C., GTE Florida Incorporated (GTE) filed a Petition for Declaratory Statement with the Commission on February 10, 1999. The Commission has 90 days after the filing of the petition to issue an order denying the petition or issuing a declaratory statement. The 90 day period ends May 11, 1999, at which time an order must be issued.

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FPSC-RECORDS/REPORTING

**DISCUSSION OF ISSUES**

**ISSUE 1:** Should the Commission grant GTE Florida Incorporated's petition for declaratory statement?

**RECOMMENDATION:** Yes, the Commission should answer the petition for declaratory statement in the affirmative, but should deny portions of GTE's proposed intraLATA new customer contact protocol.

**STAFF ANALYSIS:** Section 120.565, Florida Statutes, provides for declaratory statements. It states:

(1) Any substantially affected person may seek a declaratory statement regarding an agency's opinion as to the applicability of a statutory provision, or of any rule or order of the agency, as it applies to the petitioner's particular set of circumstances.

(2) The petition seeking a declaratory statement shall state with particularity the petitioner's set of circumstances and shall specify the statutory provision, rule, or order that the petitioner believes may apply to the set of circumstances.

A declaratory statement is a means for answering a question concerning the applicability of a statutory provision, rule, or order of the Commission as it applies or may apply to a petitioner in his particular set of circumstances only.

GTE seeks a declaration concerning Order No. PSC-95-0203-FOF-TP (IntraLATA Presubscription Order) as it applies to its particular circumstances. The order considered whether intraLATA presubscription should be implemented to complement interLATA presubscription and to further open the local exchange company toll market to competition. Presubscription is the ability of a telephone customer to preselect a telecommunications company to carry that customer's toll calls by dialing the digit "0" or "1", the area code, and the called number. This dialing pattern is referred to as "0+ or 1+" dialing. The Commission concluded that intraLATA presubscription is in the public interest and should be implemented. In Re: Investigation into IntraLATA Presubscription, 95 FPSC 2:206 (1995).

GTE is asking whether a particular contact protocol for new customers is consistent with Commission Orders. Staff believes that GTE has met the threshold requirements of section 120.565,

Florida Statutes, and Uniform Rule 28-105.002, Florida Administrative Code. It has demonstrated a genuine question or doubt regarding the legitimacy of its proposed contact protocol for new customers.

Staff believes that the Commission has jurisdiction over this proceeding pursuant to sections 364.01 and 120.565, Florida Statutes.

The Question Presented by GTE

GTE is asking whether its modification to the prescribed protocol is consistent with Commission Orders. GTE intends to read a list of competitive carriers while recommending GTE's intraLATA service. As an example, GTE provides the following script:

You have many companies to choose from to provide your local toll service. I can read from a list of the companies available for selection; however, I'd like to recommend GTE's local toll service. (Petition at 6)

Staff believes that this modification moves beyond informing the customer as required by the orders to marketing to the customer. GTE's contact protocol is not in compliance with the order.

Commission Orders

In order to fully answer GTE's question, it is necessary to set out a history of presubscription at the Commission. The issue of customer contact protocol resulted from the Commission's decision to allow presubscription of intraLATA toll service. In the IntraLATA Presubscription Order, the Commission found intraLATA presubscription was in the public interest and ordered the four large local exchange companies to implement intraLATA presubscription by the end of 1997. 95 FPSC 2:206.

During the implementation of presubscription, complaints were filed against BellSouth and a docket was opened. The Commission determined that to ensure the proper development of competition in the intraLATA market, BellSouth must maintain competitively neutral customer contact protocols. (Order No. PSC-96-1569-FOF-TP (BellSouth Restriction Order)) Restrictions were imposed on BellSouth with regard to its marketing of intraLATA toll services to new customers. Those restrictions were:

1. BellSouth shall advise customers that due to the newly competitive environment, they have an option

of selecting a long distance carrier for their local toll calls.

2. BellSouth shall offer to read to the customer the list of available carriers. If the customer responds affirmatively, then the list shall be read.
3. If the customer declines, then the customer service representative shall ask the customer to identify the carrier of choice. If the customer's response is ambiguous or non-committal, the service representative shall offer to read the list of available carriers and encourage the customer to make a selection. If the customer does not want to make a selection, the customer shall be advised that he must dial an access code to reach an intraLATA carrier each time he makes an intraLATA call until a presubscribed carrier is chosen.

In Re: Complaint of Florida Interexchange Carriers Association, MCI Telecommunications Corporation, and AT&T Communications of the Southern States, Inc., Against BellSouth Telecommunications, Inc., 96 FPSC 12:459, 463 (1996).

After the Commission imposed restrictions on BellSouth, the Commission turned its attention to the other LECs. In Proposed Agency Action Order No. PSC-97-0709-FOF-TP (PAA Order), the Commission found the other LECs should also use the competitively neutral prompts when they communicate information about intraLATA carrier choices to new customers. In Re: Generic Consideration of Incumbent Local Exchange (ILEC) Business Office Practices and Tariff Provisions in the Implementation of IntraLATA Presubscription, 97 FPSC 6:271, 274 (1997).

Order No. PSC-98-0710-FOF-TP (Generic Order), a final order resulting from a challenge of the PAA Order by Sprint-Florida, Inc. (Sprint) and GTE, approved a modification of the protocol by adding the phrase "in addition to us" when reading the list of available carriers. The Commission found that Sprint's contact script met the underlying principle of the restriction "to insure that customers have an opportunity to make informed decisions regarding the choice of intraLATA toll providers." In Re: Generic Consideration of Incumbent Local Exchange (ILEC) Business Office Practices and Tariff Provisions in the Implementation of IntraLATA Presubscription, 98 FPSC 5:560, 563-564 (1998).

In the same Order with regard to GTE marketing intraLATA toll service to its customers who call for reasons unrelated to intraLATA toll, the Commission found GTE's practice at odds with its findings in the BellSouth Restriction Order. The Commission further stated, however, that GTE was not prohibited from marketing to its customers in the same manner its competitors are marketing to their customers. (Generic Order, Id. )

Finally, in Order No. PSC-98-1469-FOF-TP (BellSouth Restriction Modification Order), the Commission considered lifting the marketing restrictions from BellSouth. Upon consideration of the reported market activity, the Commission noted that customer intraLATA activity was the only circumstance that had changed over the last 18 months since its order prohibiting the market activity BellSouth again sought to conduct. The Commission found that because of the marketing efforts customers had become sufficiently informed to make educated choices despite any inherent advantage BellSouth had due to its gatekeeper position. The Commission granted BellSouth relief from the BellSouth Restriction Order by revising the first step in the protocol. BellSouth is now required to advise customers that "due to the new competitive environment, customers have the option of selecting a carrier for their local toll calls in addition to us." In Re: Petition of BellSouth Telecommunications, Inc., to Lift Marketing Restrictions Imposed by Order No. PSC-96-1569-FOF-TP, 98 FPSC 10:514, 520 (1998).

#### The Declaration Sought by GTE

In its Petition, GTE explains its new customer contact protocol. It would offer to read a list of competitive carriers while recommending GTE's intraLATA services. GTE argues that its circumstances are similar, if not more pronounced, to those that led the Commission to modify its protocol requirements for Sprint and BellSouth. Specifically, GTE alleges that no complaints have been filed against it, nor has it been a target for investigation for former or current practices as they relate to new customers. (Petition at 4) GTE states that it has never marketed its own IntraLATA services to new customers. (Petition at 3) GTE maintains that the key consideration in the BellSouth Restriction Order was to take remedial measures. It argues that this was not the case with respect to the Generic Order; therefore, analogies should be drawn from the Order that was not based upon a complaint.

With respect to factors the Commission considered when it modified the contact protocol, GTE argues that increased competition in the intraLATA market was a key factor in eliminating BellSouth's restriction and in refusing to prohibit Sprint's



marketing to new customers. Other relevant factors in the Commission's decisions allowing LEC marketing to new customers cited by GTE include customer's awareness of increased competitive options and BellSouth's market share loss. (Petition at 4)

GTE, while stating it should be immaterial to the declaratory statement it seeks, argues its intraLATA market share erosion has been even more drastic than BellSouth's. GTE argues that the statistics of market share erosion underscore the Commission's conclusion that "[c]ompetitive changes have occurred in the intraLATA market and customer awareness and sophistications have increased" which indicates there have not been any negative effects on the IXCs.

GTE argues its new customer contact protocol meets the objective to insure that customers have an opportunity to make informed decisions regarding the choice of intraLATA toll providers. (Petition at 5). GTE argues its contact protocol is amply justified in terms of competitive conditions and the Commission's interpretation of its IntraLATA Presubscription Order.

GTE requests that the declaratory statement not approve a specific script wording, but rather confirm that the IntraLATA Presubscription Order permits GTE to offer to read a list of competitive carriers while recommending GTE's intraLATA services. In support of its request, GTE states that its proposed new customer contact protocol is consistent with prior orders and the Commission's actions with regard to BellSouth and Sprint. GTE argues the IntraLATA Presubscription Order does not require carriers to obtain approval of scripts and that the Commission did not dictate any language for Sprint, only determining Sprint was not prohibited from using language it already employed. (Petition at 6). Noting that BellSouth could advise customers they have the option of selecting local toll carriers in addition to BellSouth, GTE argues the BellSouth Restriction Modification Order does not seem to require BellSouth to use the same script language as Sprint. (Petition at 6)

#### Staff's position

In the Generic Order, the Commission agreed that Sprint's contact protocol script which used the phrase "in addition to us" met the underlying principle of the competitively neutral restriction. The Commission found Sprint's customers have an opportunity to make informed decisions regarding the choice of intraLATA toll providers. (98 FPSC 5:360, 363-364)

The marketing restrictions were intended to ensure competitively neutral customer contact protocols, increase customer awareness, and allow the IXCs to establish a presence in the intraLATA marketplace. When the Commission modified BellSouth's marketing restrictions, not only did it consider the reported market activity, but also how many entities, besides the LEC, were available for a new customer to call upon to initiate service. In its consideration to lift marketing restrictions, the Commission agreed with the joint complainants that the limited competition in local markets placed BellSouth in the unique and advantageous position of being the first point of contact for most new connections. The Commission agreed there was justifiable concern that BellSouth might use its gatekeeper position to unduly influence the customer's choice of intraLATA carriers. (98 FPSC 10:514, 519)

The Commission agreed that the first "buying experience" was crucial, but also recognized that the marketing restrictions precluded BellSouth from explaining fully its products and services. The Commission believed, however, that BellSouth had other means of educating and informing the customers besides inbound customer contacts. (Id.) Finally, the Commission offered a test that to be competitively neutral, the prompts must be consistent with the following:

If the customer declines to have the list read to him or her and the customer leaves with knowledge of only one provider, the negotiation is not competitively neutral.

(Id. at 520)

BellSouth was granted relief from the marketing requirements of Section III, Item 1 which states:

1. BellSouth shall advise customers that due to the newly competitive environment they have an option of selecting a long distance carrier for their local toll calls.

The Order revised the new customer contact protocol to state:

BellSouth shall advise customers that due to the newly competitive environment they have an option of selecting a carrier for their local toll calls in addition to us.

(Id.) BellSouth is still required to offer to read to the customers the list of available carriers and if the customer

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responds affirmatively, then read the list. Finally, if the customer declines to have the list read, the customer service representative must ask the customer to identify the carrier of choice. If the customer's response is ambiguous or non-committal, the service representative must offer to read the list of available carriers and encourage the customer to make a selection. If the customer does not want to make a selection, the customer will be advised that he must dial an access code to reach an intraLATA carrier each time he makes an intraLATA call until a presubscribed carrier is chosen. Other than the phrase "in addition to us" or "in addition to BellSouth", the above described new customer contact protocol must be followed by all LECs.

Staff agrees with GTE that the Commission does not want to approve specific script language. The language approved in the BellSouth Restriction Modification Order and the Generic Order maintained competitive neutrality while allowing the customer to be informed. The BellSouth Restriction Order approved a protocol that insured competitive neutrality. On the other hand, the Commission adopted the competitively neutral protocol as well as approved a particular part of a script to be used by Sprint in the Generic Order because Sprint asked the specific question.

GTE states that its language would be read only if the customer expressed no carrier preference when asked. Staff disagrees and recommends denial of the specific phrase "I'd like to recommend" as it goes beyond the Commission's competitively neutral standard by marketing GTE's service in a manner other CLECs do not have available. The approved phrase "in addition to us" simply informs the customer of all the available carriers but does not emphasize one carrier over another. Staff believes denial of GTE's request should be limited to language that markets service rather than language that informs the customer of choices.

Staff believes denial of this particular contact phrase is consistent with the Orders that address the circumstances where competition in the local exchange telecommunications market between LECs and CLECs is in its infancy. Staff believes that while there is competition in the intraLATA market as evidenced in GTE's petition, there is still little competition in the local exchange market where customers would be calling more than one company for local exchange service and then be offered a choice for presubscribed intraLATA service. This is the gatekeeper position that the Commission has repeatedly expressed concern about in its previous orders. Until other companies are in the position of having new customers call to presubscribe to intraLATA toll



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service, staff believes the new customer contact protocol should remain competitively neutral.

Staff recommends the denial of any recommendation by the company of its own service be limited to only calls by new customers to GTE. GTE is still allowed to market its services in the same manner as all the other companies. However, marketing to largely captive new customers could be considered anticompetitive because other companies do not have the same presence or opportunity as a LEC.

**ISSUE 2:** Should this docket be closed?

**RECOMMENDATION:** Yes, if the Commission accepts staff's recommendation on Issue 1, this docket should be closed.

**STAFF ANALYSIS:** If the Commission accepts staff's recommendation in Issue 1, a final order can be issued disposing of the petition and the docket can be closed.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of GTE Florida Incorporated )  
for Declaratory Statement that Its IntraLATA )  
Customer Contact Protocol Complies )  
with Order Number PSC-95-0203-FOF-TP )

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Docket No. 990157-72  
Filed: February 10, 1999

**PETITION FOR DECLARATORY STATEMENT**

Pursuant to Commission Rule 25-22.020, GTE Florida Incorporated ("GTE") asks the Commission for a declaratory statement that its intraLATA customer contact protocol for new customers complies with the Commission's Order implementing 1+ intraLATA presubscription. (Order No. PSC-95-0203-TP (Feb. 13, 1995) ("IntraLATA Presubscription Order").) The way in which the Order's terms are applied to GTE will determine if the Company can fairly and effectively compete in the intraLATA toll market.

In its IntraLATA Presubscription Order, the Commission held that "when new customers sign up for service they should be made aware of their options of intraLATA carriers in the same fashion as for interLATA carriers." (IntraLATA Presubscription Order at 38.) There is no question that GTE has always complied with this directive. In fact, there have never been any complaints that any of GTE's intraLATA marketing practices are not competitively neutral.

BellSouth had, however, been the target of a 1996 complaint by several interexchange carriers (IXCs). The IXCs alleged that BellSouth had devised anticompetitive business practices that would hinder the exercise of competitive choice in the intraLATA market.

In response to the IXCs' complaint, the Commission imposed upon BellSouth a number of intraLATA marketing restrictions designed to remedy BellSouth's asserted departure from the competitive neutrality requirements reflected in the IntraLATA Presubscription Order. Among other things, the Commission ordered BellSouth to stop marketing its intraLATA toll service to new customers, unless the customer introduced the subject.

As a result of the BellSouth docket, the Commission proposed, on its own motion, to apply to GTE and the other non-BellSouth local exchange carriers (LECs) the same restrictions that it had imposed upon BellSouth. (Proposed Agency Action Order No. PSC-97-0709-FOF-TP, June 13, 1997.) GTE and Sprint protested, pointing out that no complaints of anticompetitive conduct had been lodged against them. The protests led the Commission to schedule a hearing.

Ultimately, the hearing only addressed the narrow issue of the appropriate level of primary interexchange carrier change charges for existing customers. Because GTE and the other LECs had not engaged in the kind of conduct BellSouth had, these companies and the IXCs were able to stipulate most of the issues that had been so contentious in the BellSouth complaint proceeding.

One of the stipulations approved by the Commission concerned communicating information to new customers regarding intraLATA choices. It states:

The ILECs assert and the other parties agree not to contest in this proceeding, that their interLATA and intraLATA procedures for communicating information about toll choices are consistent and in compliance with PSC Order No. PSC-95-0203-FOF-TP, which states that 'when new customers sign up for service they should be made aware of their

options of intraLATA carriers in the same fashion as for interLATA carriers.' The procedures are the same in that the ILEC asks each customer if he has a choice of carrier. If the customer does not, then the ILEC will read a random list of carriers. Accordingly, there is no need for Commission action at this time. However, the parties agree to brief the issue of whether Sprint's inclusion of the statement 'in addition to us' prior to reading the list complies with this requirement.

(Order No. PSC-98-0710-FOF-TP (May 22, 1998) at Att. A, page 2 ("Generic Order").)

The Commission did, in fact, find that Sprint's practice of marketing its own intraLATA service to new customers complied with the customer contact requirement set forth in the IntraLATA Presubscription Order. Consistent with this ruling, the Commission later granted BellSouth relief from its intraLATA marketing restrictions for new customers. (Petition of BellSouth Telecommunications, Inc. to Lift Marketing Restrictions Imposed by Order No. PSC-96-1569-FOF-TP, Order No. PSC-98-1469-FOF-TP (Oct. 28, 1998) ("BellSouth Order").)

Unlike Sprint and BellSouth, GTE has never marketed its own intraLATA services to new customers. However, it plans to do so now. For customers who express no intraLATA carrier preference, the GTE representative will inform the customer that he has many companies to choose from to provide intraLATA service. The representative will then offer to read the list of competing carriers, then recommend GTE's own intraLATA service.

GTE believes the Commission's interpretation of the IntraLATA Presubscription Order in the Sprint situation is controlling here. The Commission found Sprint's marketing to new customers permissible under that Order, so there should be no question that GTE's planned script change is permissible, as well. Because there was never any marketing

restriction placed on GTE (as there was on BellSouth), there is no need for GTE to file any kind of petition for elimination of a restriction. In fact, GTE believes that even this Petition is unnecessary, given the Sprint precedent, but it is seeking a declaratory statement out of an abundance of caution.

In addition to the law, the facts support the Commission's affirming the permissibility of GTE's planned intraLATA contact protocol for new customers. As noted, there was never any complaint about any of GTE's intraLATA marketing practices, so there is no concern, like there was in the BellSouth case, that remedial measures were necessary to correct any anticompetitive market effects. This was a key consideration for the Commission in reviewing Sprint's script language. It noted that "[t]he BellSouth case was generated by a complaint.... There have been no such complaints lodged against Sprint." (Generic Order at 5.)

In refusing to prohibit Sprint's marketing to new customers, the Commission also pointed to the increased competition in the intraLATA market since the IXCs had filed their complaint against BellSouth. This was an important factor in its eliminating BellSouth's marketing restrictions. (Generic Order at 5.) The Commission observed that customer awareness of competitive options had increased, and that BellSouth's market share loss statistics corroborated BellSouth's position that its marketing restrictions for new customers should be lifted. In this regard, BellSouth's motion to lift its marketing restrictions stated that the company had lost "26% of toll pic-able access lines" in the June-September 1997 period and that "an average of 34% of new residential customers chose a carrier other than BellSouth" in the January-August 1997 time frame. (Petition of



BellSouth Telecommunications, Inc. to Lift Marketing Restrictions, filed Oct. 21, 1997, at 3.)

Although GTE's market share losses should be immaterial to the declaratory statement GTE seeks from the Commission (Sprint did not have to prove such losses), it may, nevertheless, be useful for the Commission to know that GTE's intraLATA market share erosion has been even more drastic than BellSouth's. At the end of 1998, GTE had lost almost 54% of its intraLATA toll pic-able lines. This was an 18% drop from the beginning of the year, when GTE had about 64% of toll pic-able lines. For the sample month of December 1997 (the latest available statistic), 67% of new customers chose intraLATA carriers other than GTE. In October 1998, GTE had only 33% market share, measured in terms of minutes of use—a drop from 45% at the beginning of 1998.

These statistics underscore the Commission's conclusion that "competitive changes have occurred in the intraLATA market and customer awareness and sophistication have increased." (Generic Order at 5.) As the Commission has recognized, GTE's market share loss erosion indicates there have not been "any negative effects on the IXCs." (Generic Order at 7.) In this environment, it would be anti-consumer to prohibit GTE from fully informing its customers of their intraLATA options. Like Sprint's script, GTE's meets the objective "to insure that customers have an opportunity to make informed decisions regarding the choice of intraLATA toll providers." (Generic Order at 5.)

The change GTE plans in its contact protocol is thus amply justified in terms of competitive conditions in the intraLATA market and the Commission's interpretation of its IntraLATA Presubscription Order. GTE asks the Commission to affirm these conclusions.

GTE, alone among the large LECs, never affirmatively marketed its intraLATA service to new customers. It would thus be discriminatory, arbitrary, and unfair for the Commission to forbid GTE from doing so now, when BellSouth and Sprint are subject to no such restriction.

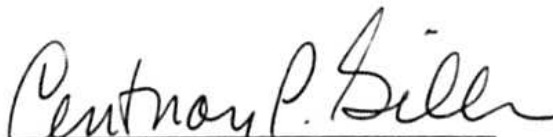
Rather than linking the Commission's declaratory statement to specific script wording, GTE asks the Commission to confirm that the IntraLATA Presubscription Order permits GTE to offer to read a list of competitive carriers while recommending GTE's intraLATA service.<sup>1</sup> GTE believes this approach is consistent with that Order, as well as the Commission's actions with regard to Sprint and BellSouth. The IntraLATA Presubscription Order does not require carriers to obtain Commission approval of their scripts. Moreover, the Commission did not dictate any language for Sprint; it just determined that it would not prohibit Sprint from using the language it already employed. (Generic Order at 5.) In BellSouth's case, the Commission ruled that BellSouth would have the ability to advise customers they have an option of selecting local toll carriers in addition to BellSouth. (BellSouth Order at 9.) The Order does not seem to require BellSouth to use the same script language as Sprint. In any event, GTE does not believe the Commission wishes to get into the business of dictating specific scripting for customer contacts.

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<sup>1</sup> An example of the script GTE plans is as follows: "You have many companies to choose from to provide your local toll service. I can read from a list of the companies available for selection; however, I'd like to recommend GTE's local toll service." As noted, this language would be read only if the customer expressed no carrier preference when asked.

For all these reasons, GTE asks the Commission for a declaratory statement that GTE's above-described contact protocol for new customers complies with the IntraLATA Presubscription Order.

Respectfully submitted on February 10, 1999.

By:   
Kimberly Caswell  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601  
Telephone: 813-483-2617

Attorney for GTE Florida Incorporated

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Petition for Declaratory Statement  
was sent via overnight mail on February 9, 1999 to:

Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street  
Room 812  
Tallahassee, FL 32399-1400

  
or Kimberly Caswell