

Matilda Sanders

060668-TP

From: Victor Graham [v.graham@globaldialtone.com]
Sent: Thursday, January 04, 2007 8:17 PM
To: Filings@psc.state.fl.us
Subject: Comments on Docket 060668

ORIGINAL

Attachments: Comments to PSC on RAF Minimum Increase.doc



Comments to
on RAF Minir

Please find attached my comments on Docket 060668-TP

Victor Graham
Global Dialtone, Inc
772-344-5841

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FPSC-COMMISSION CLERK

January 4, 2007

Director, Division of the Commission Clerk and Administrative Services,
Florida Public Service Commission,
2540 Shumard Oak Blvd.,
Tallahassee, FL 32399-0862

ORIGINAL

RE: ORDER NO. PSC-06-1008-NOR-TP (DOCKET NO. 060668-TP)

1. I am hereby submitting comments on the proposed rule regarding the minimum annual Regulatory Assessment Fees that telecommunications companies pay the Commission. Our company fully acknowledges the need for the regulated companies to bear the cost of regulation, and we are fully committed to paying our fair share. However, I have serious concerns with the formula that is proposed to obtain the required revenue.
2. We believe that the formula for obtaining the needed revenue should be based on a percentage of gross operating revenues rather than by increasing the minimum regulatory assessment fee. It is my understanding that the rationale for the current increase is primarily based on the costs of handling consumer complaints. Consumer complaints are, however, more directly related to customer base, or gross operating revenue. We therefore propose that the Commission increase the regulatory assessment fee from the amount of 0.0020 of gross operating revenues derived from intrastate business to an amount, up to the maximum permitted by law, to cover costs of regulation. Also that the minimum regulatory assessment fees for IXC's and CLEC's remain at the existing \$50.
3. It is well known that small CLEC's and IXC's have been under considerable financial pressure to remain in business. This proposed increase would translate into an annual regulatory payment of \$1,300 by our company, and would prove to be very burdensome. Our company is committed to paying our fair share, but the proposed \$1,300 payment does not have any *proportional* relationship to the costs of handling consumer complaints, while a method based on gross operating revenues would. I know that the Commission aims to be fair in distribution of the regulatory costs, and request that my comments be given due considered in determining a fair method.

Thank you,

s/ Victor A. Graham
President
Global Dialtone, Inc.

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FPSC-COMMISSION CLERK