To:Bill, Weldon, Eileen, Bev

From:LynnDate:   12/26/95

Subject:Staff Comments on GTE's LCP

I believe comments are due Tuesday, January 16 (the first business day after the January 14 "minimum 21 day" due date).

I've taken the liberty to draft the following list of topics we should probably cover in our comments and a tentative division of staff responsibility for each topic's contents:

--General praise for GTE's willingness and ability to expand local calling areas for most exchanges.  (Lynn)

--Overall revenue neutrality analysis.  Based on verification of current LCP and nonLCP  revenue streams; examination of assumptions and calculations of revised/expanded LCP revenue streams; and the appropriatness or inappropriatness of GTE's "revenue per line" method of determining revenue neutrality.  (Bill)

--Revenue shift between customer classes (e.g. bus. multiline, bus. single line, res., semipub.).

Identify and quantify any such revenue shift between classes and comment on whether or not such a shift is reasonable and in the public interest.  (Bill)

--General rate design vis-a-vis the number of lines in local calling areas (i.e. is GTE's proposal consistent with Staff's rate design presented in statewide EAS case and, if not, present an alternative rate design that is.)  Also identify/explain/justify any major shifts of revenue between exchanges under both GTE's proposal and under Staff's alternative. (Lynn)

--Reasonableness of the specific routes included in GTE's proposal.  This would include critique of 23-mile and intraLATA restrictions in general as well as specific routes included or excluded in Community Plus and Premium options.  (I anticipate that any deserving but excluded routes, other than those already agreed to by GTE (e.g. Bovill-Moscow), would not be added until after public hearings held later in 1996.)  (Lynn)

--Semipublic and PAL lines -- are GTE's restriction of LCP options for these classes reasonable and in the public interest?  (Bill)

--Local measured service general discussion.  Does LCP promote migration to measured service and, if so, is this in the public interest?  If not in the public interest, propose alternative rate design to mitigate LMS migration. (Lynn)

--Discussion of GTE's (and other telcos.) current practice of not automatically providing call detail on charges for local measured service calls.  Should billing detail for all measured calls be provided at no extra cost to customers?  (Lynn)

--Summary of customer calls, e-mail and letters regarding LCP.  (Bev)

--Staff's 7/18/95 Review of GTE's prior LCP implementation.  (completed)