IN THE SUPREME COURT OF FLORIDA

UNITED TELEPHONE LONG DISTANCE, INC., and UNITED TELEPHONE COMPANY OF FLORIDA,

Appellants,

vs.

FLORIDA PUBLIC SERVICE COMMISSION,

Appellee.

Case No. 72,988

ANSWER BRIEF OF THE CITIZENS OF THE STATE OF FLORIDA

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INTRODUCTION

This is the answer brief of the Citizens of the State of Florida, represented by the Office of the Public Counsel, Jack Shreve, Public Counsel. The Citizens appear before this Court in support of Florida Public Service Commission's Order No. 18939.

References to portion of the record are signified as (R. _____), except references to the transcript of the hearing conducted on September 23-24, 1987 which are signified as (T. _____). United Telephone Company of Florida is designated throughout as "UTF" and United Telephone Long Distance, Inc. is designated as "UTLD". "Citizens" denotes the Citizens of the State of Florida and "PSC" denotes the Public Service Commission.

STATEMENT OF CASE AND FACTS

In large measure, Appellants' statement is substantially accurate. There are significant areas of omission or mischaracterization which need to be brought to the Court's attention. These will be noted by reference to Appellants' brief and generally presented in the chronological order followed by Appellant.

UTF/UTLD have failed to point out that the Florida Public Service Commission deemed as significant, and therefore set for hearing, Appellants' application for reasons other than those listed on page 3 of Appellants' initial brief ("App. In. Br.") The PSC was very concerned that for the first time an interexchange carrier ("IXC") affiliated with major local exchange company ("LEC") with a substantial customer base, would be participating in the equal access conversion process (R 401, 403).1/

UTF/UTLD inappropriately characterizes throughout, the compensatory fee required by Order No. 18939 as a "royalty." In

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1/This process involves the individual customers choosing through a balloting process an IXC including, or alternative to, AT&T where such IXC can be accessed by dailing 1-plus the telephone number. Essentially such a process occurs whenever an LEC has installed the equipment necessary to provide 1-plus capability to IXCs other than AT&T.

fact the PSC did not impose a royalty payment requirement, but instead required a compensation payment. The use of the word "royalty" is Appellants and does not appear in the order appealed from.

Next, UTF/UTLD failed to point out that Mr. Reynolds, Vice-President Operations for UTF, addmitted on several occasions that UTF/UTLD was not willing to have UTLD operate without the "United" name in the IXC's title. (T. 64; T. 223; T. 522). Mr. Reynolds also acknowledged that the use of the United name had a value (T. 222). Witness Reynolds also admitted that UTF's parent company United Telecommunications, Inc. ("UTI") did not directly sell, to his knowledge, any products directly to the public. Rather, he said these products were sold through the various subsidiaries (T. 93). Mr. Reynolds testified that UTF provides local telephone service, operator services, intraLATA toll service, and access services, certain contractual services, and telephone maintenance services (T. 94). He acknowledged as well that the United logo was utilized in the provision of such services. Mr. Reynolds further admitted that the United logo appeared on UTF's bills and envelopes, building, trucks, and equipment (T. 95). UTF's vice president also testified that funds used to pay for the stationery and envelopes and cost of affixing the logos to buildings and vehicles were provided from customer generated funds and were treated as normal operating expenses (T. 96-98; T. 157).

Mr. Reynold's testimony directly corroborated the testimony of Citizens' witness Billy D. Smith on this point. Mr. Smith testified that the United name and logo were "ubiquitously displayed throughout UTF's 800,000 + customer service area" and appear as well on "hundreds of UTF vehicles... millions of monthly bills annually... hundreds of thousands of telephone directories... and many UTF buildings." (T. 521-522).

Witness Smith also pointed out that the value of the United Telephone name and logo was generated as a by-product of the provision of local telephone service. The function of a trademark or trade name, according to Mr. Smith, is to indicate the party which puts the goods on the market and accepts the responsibility or plaudits for their acceptability or quality. He pointed out that the UTF monopoly was the firm putting the goods on the market and that UTF was the entity that the "United" name and logo are identifying. (T. 525).

Staff witness Daryl Nall pointed out that UTLD's proposal to charge AT&T rates indicated sufficient market power to price above most competitors and that this likely results from the loyalty of the local company's monopoly customer base. Witness Reynolds acknowledged under cross-examination that internal company documents indicated that UTF was "strategically positioned to gain a substantial market share due to existing customer perceptions." (T. 76). Although Mr. Reynolds refused to publicly disclose what was meant by "a substantial market share", he acknowledged that "substantial" referred to the

forecast of market penetration UTLD would achieve as identified by an internal company study received into evidence. (T. 79-80; T. 240; R. Vol. VI, Exh. 11-K, p. 2).2/ Mr. Reynolds also acknowledged in response to questioning by the Commission that the substantial market penetration figures were predicated upon UTLD's services being offered at the same price as AT&T's (T. 81) and also predicated upon UTLD's participation in the equal access balloting process. (T. 82).

Under cross-examination by Chairman Nichols, Mr. Reynolds confirmed that in each other jurisdiction where a similar IXC operation was being set-up by UTI, the IXC utilized the name United Telephone Long Distance. The only exception was in North Carolina where the IXC name is Carolina Telephone Long Distance. The LEC name is Carolina Telephone & Telegraph Company. (T. 64-65). The staff witness Nall also testified that the use of the

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2/Confidential Exhibit 11-K contains the market share figures referred to. This exhibit was admitted into evidence (T. 240). Appellant did not designate more or less than the record required pursuant to Florida Rule of Appellate Procedure 9.200(a)(1). Therefore, the entire record, including Exhibit 11-K should have been transmitted. Appellants were requested on October 12, 1988 to advise the PSC Clerk's office of any corrections or additions to be made to the record. Apparently none were made. Citizens received a copy of the same October 12 letter. Apparently this exhibit was not transmitted to the Court initially since the PSC's only copies had been returned on approximately August 1, 1988 to the company. Citizens do not have a copy of the exhibit. Citizens have contacted UTF and UTF has agreed to make exhibits available to the Commission for transmittal to the Court.

Carolina name in North Carolina made it clear that there was a company policy "to take advantage for the benefit of the stockholders of the name, recognition and confidence built by the monopoly company." She further noted that this reputation was not built by UTF's owners, but by monopoly service to local ratepayers. Witness Nall concluded that "monopoly ratepayers must be compensated for exploitation of this reputation, most particularly since these ratepayers will also be the customers of UTLD." (T. 581).

This same point is reinforced in the questioning by Commissioner Wilson:

> Would you agree, though, that the point is not that it's United Telephone but it's that whoever the local exchange company is in the area serving the people, that it is attempting to get into the long distance service. I mean, if your name were the Banana Republic then that's the name that would have value and not United Telephone. It's whatever the name the local exchange company providing that has.

"That's right," replied UTF's Mr. Reynolds. (T. 225).

Citizens' witness Smith also testified that the UTLD proposal as originally filed would result in UTLD receiving additional uncompensated benefits derived from:

1) access to a ready, trained, and skilled work force;

2) access to proprietary information;

3) access to a relatively inexpensive and ready source of financing; and

4) access to information not available to parties not affiliated with UTLD.

(T. 521).

Witness Nall also agreed that UTLD would receive these benefits and should be compensated for them. (T. 616). This testimony was unchallenged and unrebutted. The Commission apparently accepted the testimony on this point and indicated in the order that (in addition to the name, recognition and herigate evidence) these facts formed the basis for its finding that the compensation fee requirement was necessary to protect the public interest. (R. 408).

As to valuation of the compensation fee, the testimony of witnesses Smith and Nall was wide ranging. Mr. Smith testified that the 5% royalty fee he was recommending was "conservative" and should be the "minimum". (T. 556). Smith also testified that a better alternative even to the cost compensation fee would be to account for the operations and services of UTLD "above-the-line". (T. 530).

Witness Nall presented the Commission with essentially four options for treating UTLD's application. One would be outright denial. Another option would be treating UTLD's earnings above-the-line as Mr. Smith recommended. Finally, Nall testified that the Commission could require UTLD to compensate UTF on a profit sharing arrangement similar to that required pursuant to Section 364.037, Fla. Stat. (1987) (T. 582). Finally, witness Nall proposed a range of compensation fees as reflected in Appellants' statement of the facts. (App. In. Br. 10).

Appellants' statement of the facts mentioned the testimony of witness Mark Neptune (App. In. Br. 11-12), but failed to mention that Mr. Neptune testified that UTLD received an instant 18% to 26.8% market share in the State of Missouri. (T. 471, 478-479). This number substantially corroborates the confidential market sharing projection testified to by UTF witness Reynolds. Witness for MCI Telecommunications Corporation Donald F. Evans was, over the objection of MCI, Public Counsel and Teltec Savings Communications Company, cross-examined on the impact that a 5% compensation payment would have on MCI's net income. Commissioner Beard commented that the line of cross-examination attempting to compare UTLD and MCI appeared to be "apples and oranges." (T. 277). Commissioner Wilson also declared in ruling on the admissibility of Exhibit 40-C (which proports to demonstrate the impact of a compensation fee on MCI) that the exhibit probably only demonstated "that different calculations mean different things to different companies." (T. 302).

SUMMARY OF CITIZENS' ARGUMENT

The Florida Public Service Commission's requirement that UTLD pay a compensation fee to UTF for intangible benefits received from UTF as a condition to the granting to UTLD of a Certificate of Public Convenience and Necessity should not be disturbed. The Commission's Order No. 18939 is based upon, and supported by, competent substantial evidence in the record and emanates from the regulatory ratemaking authority inherent in the PSC's statutory mandate.

The PSC found the evidence to be overwhelming that UTLD would receive a real economic value in the use of the United Telephone name in signing up customers within UTF's certificated monopoly franchise area during the equal access balloting process. The record more than amply supports a finding by the PSC that UTLD would benefit from the use of the United name, the use of UTF logo, reliance on UTF's reputation, immediate access to financing, and the ability to capitalize on trained and skilled work force, as well as various technical, personnel, administrative, informational and financial benefits. The PSC additionally found that these valuable benefits, whether owned by UTF or not, were provided by and given value by UTF at ratepayer's expense.

Faced with this evidence and these findings, the PSC was placed in the position of having to place a value upon the identified benefits received by UTLD. The Commission's method of

valuation and its ultimate valuation of the intangible benefits is soundly based upon the Commission's authority in light of the ranges of valuation contained within the record.

Furthermore, the imposition of a compensation fee does not fall factually or legally within any constitutionally proscribed regulatory action. The compensation fee can not constitute an uncompensated taking because, far from being deprived, the appellant complaining on this issue -- UTF -- benefits from the PSC ordered payments. There is, in fact, actually an enhancement of UTF's property by the PSC's order.

Additionally, the PSC possesses ample authority to preserve the integrity of the monopoly franchise granted by the people of the State of Florida through the Florida Public Service Commission. The PSC must be able to ensure that the granting of competitive IXC certificates does not constitute an unfair cross-subsidization burden upon regulated monopoly ratepayers.

Finally, there is no equal protection violation inasmuch as the record abundantly supports the Commission's finding that UTLD was uniquely situated as an IXC participating in the equal access balloting process while being affiliated with the third largest local exchange company in the state with 30% of Florida's ratepayers and a customer base of over 800,000.

ARGUMENT

I. THE PSC'S REQUIREMENT THAT UTLD PAY A COMPENSATION FEE TO UTF IS WITHIN THE PSC'S AUTHORITY AND SUPPORTED BY COMPETENT SUBSTANTIAL EVIDENCE IN THE RECORD

It is well settled that the Public Service Commission's orders are clothed with a presumption of validity and the burden is on the challenging party to overcome that presumption by showing a departure from the essential requirements of law or that the order is invalid, arbitrary or unsupported by evidence. City of Tallahassee v. Mann, 411 So.2d 162 (Fla. 1981). Appellants have failed to overcome their burden of proof and have cited no facts or legal authority requiring this Court to disturb the provisions of Order No. 18393.

Although this is factually a complex case, the issue facing the Commission and now the Court is surprising simple. The PSC was presented with an application by UTF/UTLD for a certificate for UTLD to provide IXC services within the UTF franchised monopoly area. The one aspect of the application which stood out like a sore thumb was UTLD's proposal to exploit the UTF name and reputation in building an instant customer market within UTF's certificated territory. The PSC found this situation to be intolerable unless remedied in the public interest. The question became how to cratf a remedy in the context of the application process.

UTF/UTLD candidly admitted that use of the name of the local franchise monopoly was the lynchpin to the success of the UTLD

operation, and without it the venture would not likely go forward. However, the company also asserted that any value associated with the UTF name, reputation and heritage was the property of UTF's shareholders and should be used free of charge by UTLD. Furthermore, UTF/UTLD refused or failed to place a monetary value on the benefit UTLD undeniably received from its association with UTF. Thus, in order to carry out its public interest determination obligations the PSC had to place a dollar value on the benefits to which UTF's regulated operations were entitled.

In the application hearing process, the PSC undertook to determine to what extent, if any, UTF/UTLD's application should be granted and what, if any, modification in the public interest should be made. The PSC's starting point was Section 364.335(4), Fla. Stat. (1987) which states that:

> The commission may grant a certificate, in whole or in part or with modifications in the public interest... or it may deny a certificate.

Clearly the Commission possessed the authority to attach conditions to UTF/UTLD's application as submitted if such modifications would serve the public interest. U.S. Sprint Communications Co. v. Marks, 509 So.2d 1107, 1109 (Fla. 1987); Microtel, Inc. v. Florida Public Service Commission, 483 So.2d 415, 418 (Fla. 1986)

It is also clear that the Commission's determination as to "modification in the public interest" applied to both UTLD and

UTF. The Commission's authority in this regard flows from Section 364.01, Fla. Stat. (1987) which states that:

> The Florida Public Service Commission shall exercise over and in relation to telephone companies the powers conferred by this Chapter.

[Emphasis added]. Thus, the PSC had authority to make its public interest determination regarding any modifications to UTLD's certificate with regard to the public interest as it relates to UTF and UTF's ratepayers.

The PSC properly found that the public interest in this case involved a complex assessment of the proposed UTLD scheme on competing IXCs, UTF, UTF's local monopoly ratepayers, and UTLD's prospective ratepayers. Any specific authority necessary to protect the public interest rests squarely wihtin the PSC's statutory ratemaking authority. Foremost is Section 364.14, Fla. Stat. (1987) which authorizes and obliges the PSC to make ratemaking or rate setting adjustments under certain conditions. This section provides, in part, that:

> Whenever the Commission finds, upon its own motion or upon complaint, that... the... practices of any telephone company affecting... rates, charges, tolls, rentals, or services are unjust, unreasonable, unjustly discriminatory, unduly preferential, or in any way in violation of law,... the Commission shall determine the just and reasonable rates, charges, tolls, or rentals to be thereafter observed and enforced and fixed the same by order hereinafter provided. In prescribing rates, the Commission shall allow a fair and reasonable return on the telephone company's honest and prudent investment in the property used and useful in the public service.

[Emphasis added]. This statute plainly and succinctly embodies the Commission's authority and obligation to recognize the effect upon rates of, respond to any "practices" of a local exchange company which affect the ratepayer's rates in an unjust, unreasonable, unjustly discriminatory, or unduly preferential, or otherwise illegal manner. This obligation could not be ignored simply because UTLD was the applicant for the certificate. Establishment of the compensating fee at this time will enable the PSC to remove any unjust costs (due to cross-subsidization) which would otherwise be embedded in UTF's rates.

Clearly, the provisions of Section 364.01, 364.14, 364.335 and 364.337, Fla. Stat. (1987), when read together authorize the imposition of a compensation fee under the circumstances before the PSC.

Once it was clear to the Commission that UTLD was exploiting the association with the local monopoly franchise, the PSC confronted the issue of whether the ratepaying public whose interest it is charged with protecting, should receive consideration for the value conferred upon UTLD. The Commission addressed this issue by determining what party provided the value embodied in the association with the LEC franchise. The PSC found that it was UTF that provided the value through the expenditure of ratepayer provided funds. This finding was amply supported in the record.

The PSC rightfully rejected as irrelevant UTF/UTLD's claim that the United name and logo associated with that name were

"owned" by UTF and/or its parent. Ownership is irrelevant so long as the value was established by, and continues to be maintained by ratepayer provided funds authorized and required to be collected pursuant to lawful commission orders. In a similar vein, the Commission rejected additional contentions by appellants' that image advertising or so-called "goodwill" advertising was responsible for the benefits that UTLD proposed to receive. There was ample testimony by witnesses Smith and Nall as well as UTF's own Reynolds that the ubiquitous and pervasive historical presence of the United name and logo were a product of ratepayer funded monopoly services and not image advertising.

Consistent with its authority and regulatory obligation pursuant to Section 364.14, Fla. Stat. (1987) the Commission recognized that UTF's proposed practice of allowing UTLD to receive free of charge the valuable benefits of association with the LEC franchise would constitute a cross-subsidy provided by UTF's ratepayers. This practice of UTF could therefore cause UTF's rates and charges to be unjust, unreasonable or otherwise illegal due to the presence of the cross-subsidy. Certainly the PSC can act to prevent such an occurance. The PSC chose a compensating fee arrangement to remedy the perceived injustice. The PSC's action was well within its statutory mandate and obligation and confined to, and supported by, competent substantial evidence in the record.

Having determined that a compensating fee was due to UTF, the Commission was left with a determination of where to set the level of compensating fees. As the record demonstates, UTF failed to come forward with a monetary valuation of the benefits UTLD would receive. UTF made no affirmative effort to provide any evidence to the Commission as to the value of any compensating fee. Citizens' witness Smith and PSC staff witness Nall testified that a compensating fee should be within a range of 2%-5% of gross revenue. Witness Nall also testified to a variety of earnings based valuations. Mr. Smith also testified that his 5% recommendation was conservative and should be the minimum charged.

Faced with overwhelming evidence that the associative benefits UTLD would receive had a substantial tangible dollar value even to the extent that the UTLD venture would fail without them, the PSC could not stick it head in the sand and assess no value to the compensating fee. The PSC took a reasonable course of action and chose a number squarely within the range provided in the record.

In similar cases where the PSC was confronted with competing testimony regarding a valuation affecting customer rates, this Court has recognized that "it is the PSC's prerogative to evaluate the testimony of competing experts and accord whatever weight to the conflicting opinions it deems necessary." Gulf Power Co. v. Florida Public Service Commission, 453 So.2d 799, 805 (Fla. 1984); United Telephone Co. v. Mayo, 345 So.2d 648, 654

(Fla. 1977). In such instances the Court has declined to substitute its judgment for the PSC's own action taken within the statutory range of discretion. Citizens submit that Gulf controls the disposition of this case.

In Gulf the PSC was confronted with the issue of valuation of Gulf Power's coal inventory. On one hand Gulf valued the inventory at $64,801,764 while the staff's witness valued it at $46,812,917. The PSC stated that neither valuation method was supported by the evidence. Even so, the Commission reduced the company's valuation by $8,994,424 or exactly half of the difference between the two valuations. In upholding the PSC this Court found that although the PSC rejected both valuations, it was presented with sufficient evidence to enable it to choose a reasonabe alternative. (Id.) The Gulf Court recognized that the Commission was faced with three alternatives: (1) allow Gulf's inventory without competent substantial evidence; (2) allow Gulf no inventory at all; or (3) "to make some other reasonable determination." Recognizing that an inventory value of zero would not be logical, the Court agreed that valuation between the outer limits of the proposal was found to be reasonable. Factually Gulf is indistinguishable and must control the disposition of this case.

Under the Gulf rationale, the PSC's establishment of a compensation fee equal to 2.8% of net revenues less originating and terminating access charges is reasonable and should not be disturbed. Certainly, the Commission's chosen compensation fee

level falls between Mr. Smith's minimum of 5% and United's figure of zero. In addition, although not a mathematical certainty, the Commission's chosen level probably also falls within the narrower range of witness Nall's minimum of 2% of gross revenues and United's zero.

One possible distinction between the instant case and Gulf is that here the PSC could well have determined that absent the compensation fee, UTLD's application would not be in the public interest. In this case, the PSC could deny the application outright. Section 364.355(4); such a finding would not have been disturbed by this Court. U.S. Sprint, at 1109.

II. THE COST COMPENSATION FEE CONSTITUTES A LAWFUL EXERCISE OF THE COMMISSION'S AUTHORITY AND DOES NOT PRESENT A CONSTITUTIONAL ISSUE FOR THIS COURT

With regard to the constitutional issues raised, UTF/UTLD is factually in error. Appellants' misunderstand the PSC's order. The compensation fee is ordered to be paid by UTLD to UTF and not to UTF's ratepayers. Clearly then, the compensation fee will in fact benefit UTF in the form of increased revenues. This in turn means that UTF's shareholders' opportunity to profit from the UTF operations will be accordingly enhanced. Thus, far from being harmed, UTF will be benefited by the compensation fee. On these facts alone this Court should dismiss any claims Appellants might make that UTF is the victim of PSC error in any respect, much less error of a constitional nature. The Citizens' question whether UTF has any standing to raise claims of error since UTF appears to be beneficially and not adversely affected by the PSC's decision. See Fox v. Smith, 508 So.2d 1280 (3rd D.C.A. 1987).

In fact even on a consolidated basis, UTF (including its UTLD subsidiary) are kept whole by the PSC mandated compensation fee since any payments paid to UTF or credited to UTF's income statement are eliminated in consolidated accounting. The net effect, therefore, will be a wash. The debit on UTLD's financial statements and the credit on UTF's financial statements net out leaving no impact on the consolidated UTF/UTLD entity. Once again, no constitutional taking claim is available.

With respect to Appellants' claim of confiscation due to a so-called distortion of the "ratemaking equation," a simple reading of Order No. 18939 reveals that the factual underpinning for this argument is wholly absent. UTF/UTLD's argument rests on the assumption that the compensation fee will not be paid but instead will be imputed. This assumption is flatly wrong. Order No. 18939 requires that UTLD pay and UTF collect the compensation fee. Therefore, there will be no mythical or imputed revenues to skew the ratemaking equation.

The Court should likewise dismiss Appellants' argument that the PSC's determination of a 2.8% compensation fee is arbitrary. As demonstrated above, the PSC's determination of the level of the compensation fee rests squarely within the range of evidence presented to the PSC in the record. Gulf Power Company, Id.

UTF/UTLD's final argument that the Commission's order runs afoul of the constitutional guarantee of equal protection is sorely misplaced. On a factual basis alone, the Commission had overwhelming and abundant evidence in the record to demonstrate that UTLD was indeed unique. The Commission has not been faced with another situation of an IXC affiliated with a major local exchange company. Neither has the Commission been confronted with such an IXC participating in the equal access presubscription process for the avowed purpose of building an instantaneous market share from the customer base of the monopoly LEC affiliate. On these facts alone Appellants' argument is

shown to be utterly without merit. There are no similarly situated IXCs.

CONCLUSION

The above demonstrates that the PSC's chosen method and amount of compensating UTF for valuable benefits conferred by UTF upon UTLD are justified within the statutory and constitutional framework of the PSC's regulatory powers. As such, this Court should decline to disturb the PSC's lawful exercise of discretion as being supported by competent and substantial evidence in the record. Order No. 18939 should be upheld.

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CERTIFICATE OF SERVICE
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I HEREBY CERTIFY that a true and accurate copy of the foregoing Answer Brief of the Citizens of the State of Florida has been furnished by U.S. Mail or hand delivery this 11th day of January, 1989 to:

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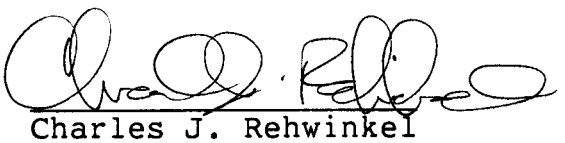

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