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December 23, 1992

Mr. Steve C. Tribble
Director, Division of Record &
Reporting
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, Florida 32399-0850

Re: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed for filing is the original and fifteen copies of Southern Bell Telephone and Telegraph Company's Opposition to Public Counsel's Motion to Hold Service Hearings in Palm Beach County.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached certificate of service.

Sincerely yours,

Harris R. Anthony
Harris R. Anthony (eg)

ACK _____

AFA _____

APP _____

CAF _____

CMU _____ Enclosures

CTR _____ cc: All parties of record
EAG _____ Mr. A. M. Lombardo
LEG 1 _____ R. Douglas Lackey, Esq.

LIN 6 _____

OPC _____

RCH 1 _____

SEC 1 _____

WAS _____

OTH _____

DOCUMENT NUMBER-DATE

14853 DEC 23 1992

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 23rd day of December, 1992
to:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of) Docket No. 920260-TL
the Revenue Requirements and Rate)
Stabilization Plan of Southern) Filed: December 23, 1992
Bell Telephone and Telegraph)
Company)
_____)

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
OPPOSITION TO PUBLIC COUNSEL'S MOTION
TO HOLD SERVICE HEARINGS IN PALM BEACH COUNTY**

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or the "Company"), pursuant to Rule 25-22.037, Florida Administrative Code, and herewith files this response in Opposition to Public Counsel's ("Public Counsel") Motion To Hold Service Hearings in Palm Beach County.

1. On December 18, 1992, the Office of Public Counsel ("Public Counsel") served a motion entitled, "Motion to Hold Service Hearings in Palm Beach County." In its Motion, Public Counsel notes that, although Southern Bell serves customers in Palm Beach County, service hearings are not scheduled to be held in that area. Public Counsel then argues that such hearings should be held. Southern Bell opposes this Motion for a number of reasons.

2. First, service hearings have previously been scheduled and, with the exception of those set for Miami¹, already held throughout the state in this docket. As a part of this process, service hearings were held in Plantation, Florida on September 14, 1992. Plantation is in Broward County, which is the county immediately adjacent to the southern border of Palm Beach County. Thus, Palm Beach customers who have had an interest in the service hearings conducted in Docket No. 920260-TL have had an opportunity to be heard by this Commission. Moreover, service hearings are scheduled in Miami for January 11, 1993. If any customer in Palm Beach County has any service related issues he wishes to bring to the Florida Public Service Commission's (the "Commission") attention, he can attend those hearings or otherwise communicate that concern to the Commission in writing. Thus, given the extensive number of service hearings already held, as well as the upcoming Miami service hearing, there is no need for a service hearing in Palm Beach County.

3. Furthermore, to have hearings in Palm Beach County as suggested by Public Counsel would place further burdens on the already limited resources of Southern Bell and the other parties to this proceeding. Three weeks of hearings are scheduled to

¹ The Miami hearings were originally scheduled for August 24, 1992. They were postponed until January 11, 1993 because of Hurricane Andrew.

begin in this case on January 25, 1993. Between now and that date, the Miami service hearings, three prehearing conferences, and one week's worth of depositions are all scheduled. Southern Bell also is obligated to respond to the voluminous discovery that has been served upon it. In addition, of course, Southern Bell's witnesses and attorneys must prepare for the hearings in this matter. It would therefore be unduly burdensome for the Commission to set any additional service hearings at this time.²

4. This conclusion is confirmed by the by the lack of timeliness of Public Counsel's Motion. The schedule for service hearings in this docket was originally noticed in June of 1992 and the hearings themselves, with the exception of Miami, were held during August and September of 1992. If Public Counsel wished to raise the question of whether or not hearings should also have been held in Palm Beach County, the time to do so was at the time of the original scheduling of these hearings. To wait until the last half of December to raise this issue is entirely inappropriate and should not be permitted.

² Since so-called "plain vanilla" quality of service issues are to be heard during the January/February hearings, it would be inappropriate to hold service hearings thereafter.

Wherefore, Southern Bell respectfully requests that Public Counsel's Motion to Hold Service Hearings in Palm Beach County be denied.

Respectfully submitted this 23rd day of December, 1992.

ATTORNEYS FOR SOUTHERN BELL
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