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December 17, 1992

Mr. Steve Tribble, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, FL 32399-0850

Hand-Delivery

Docket No. 920260-TL

Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company (Formerly FPSC Docket No. 880069-TL)

Dear Mr. Tribble:

W. S ....

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Enclosed on behalf of the Florida Hotel and Motel Association, for filing in the above docket, are an original and fifteen copies of the Prehearing Statement of the Florida Hotel and Motel Association.

Also enclosed is a diskette containing the Prehearing Statement of the Florida Hotel and Motel Association (said diskette being 5 1/4", double-sided/high density).

AFA`	Please	acknowledge receipt of the foregoing by stamping the copy of this letter and returning same to	he
APP	attention.	Thank you for your assistance.	шy
	<u> </u>	Sincerely,	
CFR	)	- Jam & Warn	
	****	Thomas F. Woods	
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PSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate	) )	Docket	No. 920260-	-TL
Stabilization Plan of Southern Bell Telephone and Telegraph	) )	Filed:	December 1	7, 1992
Company	1			

## PREHEARING STATEMENT OF THE FLORIDA HOTEL AND MOTEL ASSOCIATION

Pursuant to Orders Nos. PSC-92-1195-PCO-TL, PSC-92-1320-PCO-TL, and PSC-92-1420-PCO-TL, and Rules 25-22.028(1) and 25-22.038(3), Florida Administrative Code, the Florida Hotel and Motel Association (FHMA) files its prehearing statement.

a) The name of all known witnesses that may be called by the party, and the subject matter of their testimony:

None.

b) A description of all known exhibits that may be used by the party, whether they may be identified on a composite basis, and the witness sponsoring each:

None.

- c) A statement of basic position in the proceeding: None, pending completion of discovery.
- d) A statement of each question of fact the party considers at issue, the party's position on each such issue, and which of the party's witnesses will address the issue,

and

e) A statement of each question of law the party considers at issue and the party's position on each such issue,

and

f) A statement of each policy question the party considers at issue, the party's position on each such issue, and which of the party's witnesses will address the issue:

It is FHMA's understanding that the issues heretofore identified in this proceeding are as set forth in Appendix "A" to Order No. PSC-92-1320-PCO-TL. At this time, FHMA has an interest in Issues 33a-e and 39a-d therein. FHMA takes no position in those issues at this time, pending completion and review of discovery, most notably depositions scheduled to be held next month.

FHMA has been hampered in formulating its positions on issues of interest by the ongoing failure of Mr. Sidney J. White, Jr., counsel for Southern Bell Telephone and Telegraph Company, to return repeated telephone calls to him by the undersigned counsel.

FHMA takes no position on the remaining issues listed in the aforesaid Appendix "A."

g) A statement of issues that have been stipulated to by the parties:

None.

h) A statement of all pending motions or other matters the party seeks action upon:

None.

i) A statement as to any requirement set forth in [the Prehearing Officer's procedural orders] that cannot be complied with, and the reasons therefore:

FHMA believes it has hereby complied with said orders. Please see the discussion under d, e and f hereinabove.

j) A diskette containing this prehearing statement accompanies this filing. The diskette is 5 1/4", double-sided/high density. The operating system is a Arche Rival 286 Wordprocessor and the software used is Word Perfect 5.1.

Respectfully submitted,

Thomas F. Woods

Gatlin, Woods, Carlson & Cowdery

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(904) 877-7191

Attorneys for the Florida Hotel and Motel Association

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand-delivery to Angela B. Green, Esq., Division of Legal Services, Florida Public Service Commission, 101 East Gaines Street, Tallahassee, Florida 32399-0850, and by U.S. mail to all remaining parties, as listed hereinbelow, on this 17th day of December, 1992.

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