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April 19, 1993

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

RE: Docket No. 920260-TL, 900960-TL, 910163-TL, 910727-TL

Dear Mr. Tribble:

Enclosed is an original and fifteen copies of a Southern Bell Telephone and Telegraph Company's Motion to Stay Order No. PSC-93-0540-PCO-TL. Please file this document in the above-captioned dockets.

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 on the parties shown on the attached Certificate of Service.

Sincerely,

R. Douglas Lackey
R. Douglas Lackey

Enclosures

cc: All Parties of Record
A. M. Lombardo
H. R. Anthony

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FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

Docket No. 920260-TL

Docket No. 900960-TL

Docket No. 910163-TL

Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 19th day of April, 1993 to:

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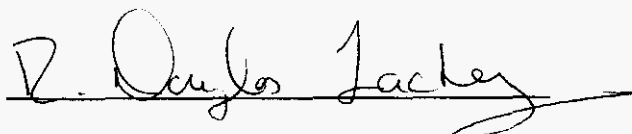
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Comprehensive review of)
revenue requirements and rate)
stabilization plan of SOUTHERN)
BELL TELEPHONE AND TELEGRAPH)
COMPANY)
-----)

DOCKET NO. 920260-TL

In Re: Investigation into the)
integrity of SOUTHERN BELL)
TELEPHONE AND TELEGRAPH)
COMPANY'S repair service)
activities and reports.)
-----)

DOCKET NO. 910163-TL

In Re: Investigation into)
SOUTHERN BELL TELEPHONE AND)
TELEGRAPH COMPANY'S compliance)
with Rule 25-4.110(2), F.A.C.,)
rebates.)
-----)

DOCKET NO. 910727-TL

In Re: Show cause proceeding)
against SOUTHERN BELL TELEPHONE)
AND TELEGRAPH COMPANY for)
misbilling customers.)
-----)

DOCKET NO. 900960-TL

FILED: April 19, 1993

MOTION TO STAY
ORDER NO. PSC-93-0540-PCO-TL

TO: Susan F. Clark
Commissioner and
Prehearing Officer

Comes now Southern Bell Telephone and Telegraph Company
("Southern Bell") and, pursuant to Rule 25-22.037 (2), F.A.C.,
herewith files its Motion to Stay Order No. PSC-93-0540-PCO-TL,
issued April 9, 1993, in the referenced dockets. In support of

its motion, Southern Bell would state as follows:

1. The referenced order deals with certain requests made by the Staff audit team as a part of its audit of Southern Bell's affiliated transactions. The requests by the audit team were objected to by Southern Bell and were the subject of a motion to compel filed by the audit team. The order essentially found in favor of the audit team and Southern Bell has been directed to provide the audit team with access to the requested material within twenty days.

2. Southern Bell has asked the entire Commission to review the Prehearing Officer's order. In its motion seeking review, Southern Bell continues to assert, with respect to the materials related to its affiliates, that it has neither possession, custody nor control of the requested documents. Therefore, in the absence of a stay, Southern Bell will be placed in the position of not being able to comply with the Prehearing Officer's order during the pendency and final resolution of the issue regarding the FPSC's jurisdiction over these affiliates.

3. The Prehearing Officer has favorably considered similar requests by Southern Bell regarding earlier discovery disputes. In each instance the Prehearing Officer has agreed that a failure to grant a stay would simply prevent Southern Bell from obtaining any meaningful relief if it were successful in its appeal. The same logic applies in the present situation and a stay should be granted. No doubt the full commission will consider the motion for review filed by Southern Bell very promptly and therefore no harm will be done to the audit team while the matter is under

review. This is particularly true since the audit team has made numerous other requests for materials and Southern Bell has either provided or agreed to provide a great deal of material which no doubt will require the devotion of substantial time and resources to review.

Wherefore, Southern Bell respectfully requests that the Prehearing Officer grant its motion staying the requirements of the referenced order until the matter has been reviewed and decided by the full commission.

Respectfully submitted this 19th day of April, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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