

YOUNG, VAN ASSENDERP & VARNADOE, P. A.

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REPLY TO

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October 11, 1996

**Ms. Blanco Bayo
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850**

**Re: Docket No. 960603-TC
Request for waiver of rules and policies which prohibit
provisions of 0+ local and 0+ intraLATA calls from
store-and-forward pay telephones located in confinement
facilities by ATN, Inc.**

Dear Ms. Bayo:

Enclosed find the original and fifteen (15) copies of Quincy Telephone Company's Petition for Leave to Intervene in the above docket. Parties of record as indicated on the certificate of service have been served.

Sincerely,



David B. Erwin

DBE:akh
Enclosures
cc: Tom McCabe

ACK _____
AFA _____
AEP _____

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for waiver of)
rules and policies which pro-)
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and 0+ intraLATA calls from)
store-and-forward pay telephones)
located in confinement facili-)
ties by ATN, Inc.)

Docket No. 960603-TC
Filed: October 11, 1996

QUINCY TELEPHONE COMPANY'S
PETITION FOR LEAVE TO INTERVENE

Quincy Telephone Company, pursuant to Rule 25-22.039, F.A.C., hereby requests leave to intervene in these proceedings, and as grounds therefor states as follows:

1. Quincy Telephone Company is a telephone company lawfully doing business in the State of Florida pursuant to authority granted by this Commission.

2. Quincy Telephone Company's principal place of business in Florida is at

107 W. Franklin Street
P. O. Box 189
Quincy, Florida 32353

3. All pleadings and other documents in this proceeding may be served upon the undersigned attorney for Quincy Telephone Company at the address given below.

4. Any decision made by the Commission in this proceeding will affect the substantial interests of Quincy Telephone Company and its business operations. The petition in this docket asks for waiver of specified rules that affect the manner in which Petitioner can conduct business through its pay telephones located in confinement facilities. Today 0+ local and 0+

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intraLATA calls are reserved to the local exchange company (LEC). If Petitioner's request for waiver is granted Petitioner could completely bypass the LEC and deprive the LEC of revenue from 0+ local and 0+ intraLATA traffic.

5. Even if Petitioner does not provide pay telephone service to confinement facilities in Quincy Telephone Company's service territory today, Petitioner has statewide authority, and Petitioner could provide such service at any time, thereby affecting Quincy Telephone Company's substantial interests. If Quincy Telephone Company does not challenge the requested waiver at this time, it may have forever lost the opportunity to do so.

6. ALLTEL Florida, Inc., has filed a timely Petition on Proposed Agency Action in this docket, thereby already raising the issues that also affect Quincy Telephone Company

WHEREFORE, Quincy Telephone Company requests that the Commission grant the company leave to intervene for all legal purposes in this docket.

Respectfully submitted,



David B. Erwin
Young, van Assenderp & Varnadoe, P.A.
225 S. Adams, Ste. 200
P. O. Box 1833
Tallahassee, FL 32302

Attorneys for
Quincy Telephone Company
107 W. Franklin Street
P. O. Box 189
Quincy, Florida 32353

CERTIFICATE OF SERVICE
DOCKET NO. 960603-TC

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail or hand delivery this 11 day of October, 1996, to the following:

Martha Brown
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Robert Spangler
ATN, Inc.
919 Dilworth Street
St. Marys, Georgia 31558

Lee L. Willis
J. Jeffry Wahlen
Ausley & McMullen
P. O. Box 391
Tallahassee, FL 32302

Harriet Eudy
ALLTEL Florida, Inc.
P. O. Box 550
Live Oak, FL 32060


David B. Erwin

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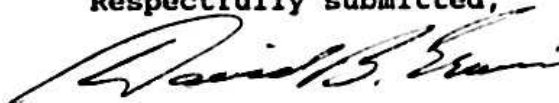
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