

ORIGINAL



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June 13, 2001

Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 010089-TP
Complaint of Charlene Hoag against Verizon Florida Inc. and Sprint
Communications Company, Limited Partnership d/b/a Sprint for Alleged
Improper Billing

Dear Ms. Bayo:

Please find enclosed an original and 15 copies of Verizon Florida Inc.'s Joinder in
Sprint's Objections to Reconsideration of Order Dismissing Request for Informal
Conference (PSC-01-0521-FOF-TP) for filing in the above matter. Service has been
made as indicated on the Certificate of Service. If there are any questions regarding
this matter, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

- APP
- CA
- CMP KC:tas
- COM Enclosures
- CTR
- EDR
- LEG
- OPC
- PAF
- RGC
- SEC
- SER
- OTH

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
07360 JUN 13 2001
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Charlene Hoag) Docket No. 010089-TP
Against Verizon Florida Inc. and) Filed: June 13, 2001
Sprint Communications Company,)
Limited Partnership d/b/a Sprint)
For Alleged Improper Billing)
_____)

**VERIZON FLORIDA INC.'S JOINDER IN SPRINT'S OBJECTIONS
TO RECONSIDERATION OF ORDER DISMISSING REQUEST FOR
INFORMAL CONFERENCE (PSC-01-0521-FOF-TP)**

Verizon Florida Inc. (Verizon) joins in Sprint's Objections to Reconsideration of the Commission's Order PSC-01-0521-FOF-TP (issued March 6, 2001), dismissing Ms. Charlene Hoag's Request for Informal Conference.

This docket concerns a complaint against both Verizon and Sprint Communications Company, Limited Partnership d/b/a Sprint (Sprint) for alleged improper billing. On April 17, 2000, the complainant, Ms. Hoag, sought an informal conference in this matter. The Commission properly dismissed the Request because it found that Ms. Hoag's complaint fails to state a basis upon which relief can be granted. (Order at 4).

Ms. Hoag apparently wishes the Commission to reconsider its Order. Verizon agrees with Sprint that Complainant's attempted reconsideration is improper for a number of reasons. Verizon is in the same position as Sprint. It was never served with any document that would form the basis for reconsideration of the Order, in accordance with Commission Rule 28-106.110. The correspondence that was apparently intended to serve as a reconsideration request was, moreover, not timely filed under Rule 25-22.060.

DOCUMENT NUMBER-DATE

07360 JUN 13 2001

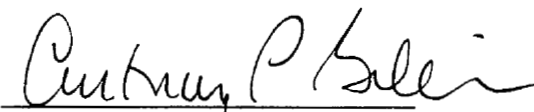
FPSC-RECORDS/REPORTING

Even if the Commission were to consider Ms. Hoag's efforts to obtain reconsideration as legally sufficient (which they are not), there is still no lawful basis for reconsideration. A motion for reconsideration must contain a "precise statement of the grounds for reconsideration." Rule 25-22.060(2). Ms. Hoag has failed to meet this standard, as her request sets forth no grounds at all for reconsideration.

The Commission will not grant reconsideration in the absence of a demonstration that it has overlooked or failed to consider relevant law or evidence. *See, e.g., Diamond Cab Co. v. King*, 146 So. 2d 889 (Fla. 1962). An "arbitrary feeling that a mistake may have been made" is plainly insufficient. *See, e.g., Stewart Bonded Warehouse, Inc. v. Bevis*, 294 So. 2d 315, 317 (Fla. 1974). Thus, Ms. Hoag's disagreement with the Commission's decision is not enough to ground reconsideration.

For all of these reasons, Verizon joins in Sprint's request that the Commission deny reconsideration of its Order and decline to reopen the docket.

Respectfully submitted on June 13, 2001.

By: 
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Attorney for Verizon Florida Inc.

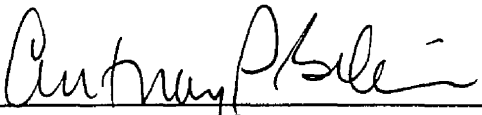
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Joinder in Sprint's Objections to Reconsideration of Order Dismissing Request for Informal Conference (PSC-01-0521-FOF-TP) in Docket No. 010089-TP were sent via U.S. mail on June 13, 2001 to:

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Tallahassee, FL 32399-0850

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