

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

Petition by Verizon Florida, Inc. to Reform
Intrastate Network Access and Basic Local
Telecommunications Rates in Accordance
with Section 364.164, Florida States.

Docket No. 030867 - TL

Petition by Sprint-Florida, Incorporated to
Reduce Intrastate Switched Network Access
Rates to Interstate Parity in Revenue - Neutral
Manner Pursuant to Section 364.164(1),
Florida Statutes.

Docket No. 030868 - TL

Petition for Implementation of Section 364.164,
Florida Statutes, by Rebalancing Rates in a
Revenue - Neutral Manner Through Decreases
In Intrastate Switched Access Charges With
Offsetting Rate Adjustments for Basic Services,
By BellSouth Telecommunications, Inc.

Docket No. 030869 - TL

ATTORNEY GENERAL'S MOTION FOR SUMMARY FINAL ORDER

CHARLES J. CRIST, JR., Attorney General, State of Florida (Attorney General), pursuant to Rule 28-106.204(4), Florida Administrative Code, moves the Florida Public Service Commission (the "Commission") for entry of a summary final order against the Petitioners in this proceeding.

The grounds for this motion and the substantial matters of law to be argued are:

1. Petitioners Verizon Florida Inc., Sprint-Florida, and BellSouth Telecommunications, Inc. have each filed petitions to raise their local telecommunications services rates pursuant to Section 364.164(1), Florida Statutes (2003) (the "Petitions").

2. By way of a contemporaneously filed petition, the Attorney General has sought leave to intervene as a party in this proceeding as this matter is of great public importance.

The Attorney
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General therefore respectfully requests the Commission not only grant the intervention, but as set forth herein also grant this Motion brought to protect Florida's consumers.

3. In evaluating the Petitions, the Commission is required to consider whether those Petitions will benefit residential consumers. § 364.164(1)(a), Florida Statutes (2003). Moreover, the Commission has an overriding obligation to ensure that basic local telecommunications services are available to all consumers in the state at reasonable and affordable prices. § 364.01(4)(a), Florida Statutes. Therefore, the Commission must exercise "appropriate regulatory oversight to protect consumers" and ensure that Petitioners' proposed actions will in fact benefit residential consumers. § 364.01(3), Florida Statutes.

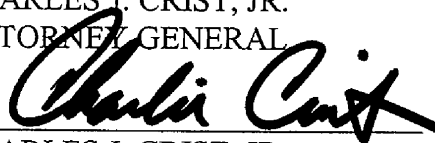
4. Neither the Petitions, nor the record evidence submitted in support of those Petitions, demonstrate that the relief requested will benefit residential consumers. To the contrary, the Petitions and record evidence indicate residential consumers will be forced to shoulder additional cost for local telecommunications services without receiving any corresponding benefit.

5. The record raises no genuine issue as to whether the Petitions will benefit residential consumers. The record in fact demonstrates granting the Petitions will be detrimental to Florida's consumers. The Petitions should therefore be denied as a matter of law.

WHEREFORE, the Attorney General respectfully requests that the Commission enter a summary final order against the Petitioners in this proceeding.

DATED this 17th day of November, 2003.

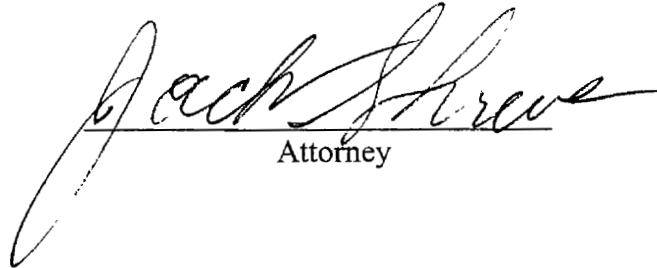
Respectfully submitted,
CHARLES J. CRIST, JR.
ATTORNEY GENERAL

A handwritten signature in black ink, reading "Charles J. Crist, Jr.", written over a horizontal line.

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STATEMENT OF COMPLIANCE WITH RULE 28-106.204(3)

Pursuant to Rule 28-106.204(3), Fla. Admin. Code, the Movant has conferred with the other parties of record. As of the time of this filing, the Office of Public Counsel and Michael B. Twomey have no objection to this Motion. BellSouth objects to this Motion. Verizon and Sprint were unable to provide a response at this time.


Attorney

CERTIFICATE OF SERVICE
DOCKETS NOS. 030867-TL, 030868-TL, 030689-TL

I CERTIFY that a true and correct copy hereof has been furnished by United States mail to the following on this 17th day of November, 2003.

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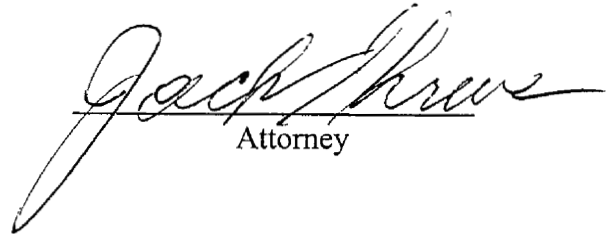
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