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PLEASE REPLY TO:
TALLAHASSEE

July 27, 1990

HAND DELIVERED

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

Re: Docket No. 891374-TL, Proposed Tariff Filing by
Southern Bell Telephone and Telegraph Company for a
Trial of the Market Reach Plan in the Lake Mary Wire
Center of the Sanford Exchange T-89-0597 Filed
November 29, 1989 and T-89-622 Filed December 14, 1989.

Dear Mr. Tribble:

Enclosed for filing and distribution are the original and
fifteen copies of FIXCA's Motion to Intervene. An extra copy is
enclosed for acknowledgment of receipt; please return it to me.

ACK _____
AFA _____
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG 1 u/m _____
LIN b _____
OPC L _____
RCH _____
SEC L _____
WAS _____
QTH _____

Yours truly,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

VGK/jfg

Enclosures

DOCUMENT NUMBER-DATE

06796 JUL 27 1990

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed tariff filing by) DOCKET NO. 891374-TL
Southern Bell Telephone and Telegraph)
Company for a trial of the market) FILED: July 27, 1990
reach plan in the Lake Mary Wire)
Center of the Sanford Exchange)
T-89-0597 filed November 29, 1989)
and T-89-622 filed December 14, 1989.)

FIXCA'S MOTION TO INTERVENE

The Florida Interexchange Carriers Association ("FIXCA"), through its undersigned counsel, moves to intervene in the above docket and in support states:

1. The name and address of the Intervenor is:

Florida Interexchange Carriers Association
c/o Joseph Gillan
Post Office Box 541038
Orlando, Florida 32854-1038

2. The name and address of the individuals who should receive copies of orders, notices, pleadings and other communications in this docket are:

Joseph A. McGlothlin
Vicki Gordon Kaufman
Lawson, McWhirter, Grandoff and Reeves
522 East Park Avenue, Suite 200
Tallahassee, Florida 32301

3. In the above docket, Southern Bell Telephone and Telegraph Company ("Southern Bell") has received approval to institute the Market Reach Plan ("plan") on an experimental basis. This plan expands the local calling area and discounts

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all intra-LATA toll charges. The plan discounts outgoing calls to the entire LATA in order to make the plan more attractive to customers.

4. In approving the plan on an experimental basis, the Commission raised several significant issues:

a. Will LATA-wide reduced toll rates cover relevant access charges?

b. Should the plan have increased the number of individual network features available?

c. Why does the plan not explain the purposes of the trial or the standards by which the trial will be evaluated?

d. Why does the plan provide for usage sensitive billing where there is a high percentage of nontraffic sensitive costs?

e. Why are payphone providers and shared tenant service providers unable to subscribe to Market Reach?

The Commission additionally noted that because the plan projects a loss, Southern Bell will not be able to implement it on a statewide basis. Order No. 22799 at 4.

5. Despite these problems, it is contemplated that, depending on the results of the experimental program, Southern Bell may request permanent implementation of this or similar plans. Therefore, it is especially important that the Commission and affected parties review the results of this experimental tariff.

6. FIXCA members provide interexchange service within Florida and in the trial area. As interexchange carriers, FIXCA's substantial interests will be affected by pricing provisions of the experimental plan, their relationship to the local calling aspects of the program, and their relationship to access charges paid by interexchange carriers to provide similar long distance service. Inasmuch as the plan has been approved only on an experimental basis, subject to the submission of data and further evaluation, FIXCA wishes to intervene to protect its interests.

WHEREFORE, FIXCA requests the Commission to enter an order authorizing it to intervene and participate as a full party in the above proceeding.

Vicki Gordon Kaufman

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Attorneys for the Florida
Interexchange Carriers
Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of FIXCA's Motion to Intervene has been delivered by U.S. Mail to the following parties of record this 27th day of July, 1990:

John Adams
Division of Legal Services
Florida Public Service Commission
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Tallahassee, Florida 32301

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150 South Monroe Street
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Tallahassee, Florida 32301

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