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SPECIAL CONSULTANT  
(NOT A MEMBER OF THE  
FLORIDA BARI)

September 11, 1990

Mr. Steve Tribble, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0850

**HAND DELIVERY**

Re: Docket No. 891374-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket are an original and fifteen copies of the Florida Pay Telephone Association's Motion to Intervene. Please date-stamp the extra copy enclosed to indicate the original was filed and return a copy to me.

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG LW/m
- LIN 6
- OPC 1
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

If you have any questions regarding this matter, please advise. Thank you for your assistance in processing this filing.

Sincerely,

Barry E. Selvidge  
For the Firm

BES:sb/tribble.ltr

Enclosures

cc: Parties of Record  
Mr. Jeffrey Hanft

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

\* SOUTH FLORIDA REGIONAL OFFICE  
SUITE 900, 2000 PALM BEACH LAKES BOULEVARD, WEST PALM BEACH, FLORIDA 33410  
TELEPHONE: 407/640-0820  
TELECOPIER: 407/640-8202

DOCUMENT NUMBER-DATE

08121 SEP 11 1990

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: 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. )

Docket No. 891374-TL

Filed: September 11, 1990

**FLORIDA PAY TELEPHONE ASSOCIATION, INC.'S  
MOTION TO INTERVENE**

The Florida Pay Telephone Association, Inc. ("FPTA"), 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 Pay Telephone Association, Inc.  
c/o Jeffrey Harft  
Peoples Telephone Company  
8041 N.W. 14th Street  
Miami, FL 33126

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

Bruce W. Renard, Esq.  
Floyd R. Self, Esq.  
Barry E. Selvidge, Esq.  
Messer, Vickers, Caparello,  
French, Madsen & Lewis, P.A.  
Post Office Box 1876  
Tallahassee, FL 32302-1876

3. In Docket No. 891374-TL, Southern Bell Telephone and Telegraph Company ("Southern Bell") has received Florida Public Service Commission ("Commission") approval to institute the Market Reach Plan ("Plan") on an experimental basis. The Plan expands the local calling area, discounts all intra local access transport area ("intraLATA") toll charges, and discounts outgoing calls to the entire local access transport area ("LATA") as incentives for customers.

DOCUMENT NUMBER-DATE

08121 SEP 11 1990

FPSC-RECORDS/REPORTING

4. The Commission's approval of the Plan on an experimental basis has raised a number of issues affecting FPTA's members, the most significant of which is the inability of nonLEC PATS providers to subscribe to the Plan. As FPTA members provide nonLEC pay telephone service to consumers throughout Florida and within the trial area, its substantial interests are directly affected by Southern Bell's actions.

5. FPTA further understands that Southern Bell may request permanent implementation of this Plan based on the results of the experiment. Thus, it is essential that a full review of the results of this experimental tariff be conducted by the Commission and any affected parties. Since the Plan has been approved only on an experimental basis subject to further review, FPTA believes this intervention is necessary to protect its members' interests.

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

Respectfully submitted,

MESSER, VICKERS, CAPARELLO,  
FRENCH, MADSEN & LEWIS, P.A.  
215 South Monroe Street  
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BY: 

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FLOYD R. SELF, ESQ.  
BARRY E. SELVIDGE, ESQ.

Counsel for Florida Pay Telephone  
Association, Inc.

:sb\intervene.sbt

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Intervene in Docket No. 891374-TL has been served by U.S. Mail or Hand Delivery (\*) on September 11, 1990 to the following parties of record:

John Adams, Esq.\*  
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Florida Public Service Commission  
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Atlanta, GA 30375

Ms. Monique Cheek\*  
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BY: 