



**Telecharge**  
incorporated

145 Madeira Avenue - Coral Gables - Florida 33134  
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July 1, 1991

**ORIGINAL  
FILE COPY**

Mr. Steve Tribble,  
Director,  
Div. of RECORDS & REPORTING  
Florida Public Service Commission  
Tallahassee, Florida 32399

Dear Mr. Tribble;

Attached herewith is my Petition for Formal Proceeding.

Reference is made to:

Docket No. 910486-TL  
Order No. 24654  
Issued: 6/11/91

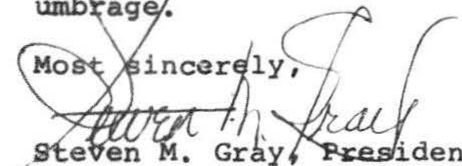
The Case background, while accurate as to the dollar amounts and to matters not relevant to the central issue, the Petitioner wishes to draw attention to the primary and singular cause of this dispute.

On March 26 (to the best of my belief), I contacted the Southern Bell Telephone Company's Business Office. An order was given, and accepted (by reason of the almost immediate action taken, to shut off service) to suspend service on all ESSX lines. No warning was given that a request for suspension would only become termination. No request was made that I contact the ESSX department.

Based on this order, and suspension (shut off), I continued engineering. All subsequent communication with Southern Bell dealt with a fait accompli, namely 'termination' from which there was no retreat except at very great expense.

It is my genuine conviction that I conducted myself as a respectable businessman, and received, in return, calloused and high-handed treatment to which I take umbrage.

Most sincerely,

  
Steven M. Gray, President  
SMG:sp

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

# Steven M. Gray

145 Madeira Avenue ~ Coral Gables, Florida 33134

July 1, 1991

The FLORIDA PUBLIC SERVICE COMMISSION,  
Tallahassee, Florida 32399-0870

PETITION FOR FORMAL PROCEEDING  
Docket No: 910486-TL

The Petitioner GHF Associates, by its President Steven M. Gray files a Petition for Formal Proceeding. Petitioner's address:

STEVEN M. GRAY  
145 Madeira Avenue  
Coral Gables, Florida 33134  
305-567-1801 Fax: 567-1578

25-22,037

(a) 2. A decision of the Commission to deny this Petitioner the right of monies unjustly demanded, and paid under protest by and to Southern Bell Telephone Company for having his service terminated at a critical time when no such order was given or sought would impose a sanction so acute as to make unlikely the re-construction of its singularly unique crime-solving technology.

(a) 3. The issues in dispute are:

1. Southern Bell states that on March 26, 1990 it received an order from the Petitioner to disconnect the ESSX service.

If "disconnect" means Sus<sup>P</sup>ension, the statement is correct. If "disconnect" means Terminate, as claimed by Southern Bell, it is incorrect.

(a) 3. (continued)

No order, by me, or by the Company, was given to Southern Bell to terminate service.

2. Southern Bell states: On March 29, 1990, the petitioner was given the 'exact cost of termination'. The calling Operator was informed that termination was not requested, or wanted. To re-instate what had by then become a fait accompli would have been a financial imposition without merit or conscience.
3. The recovery of \$4,524.33 and interest. This sum was paid under duress and threat of discontinuance of both regular service and 976 lines.
4. The recovery of approximately \$1500. and interest. This sum was recently paid, on threat of service discontinuance based on Southern Bell's claim for interest and late charges for unpaid balance of \$8,250. Said balance is in dispute, as with \$4,524.33 totalling to \$12,774.33 as the cost of termination.

(a) 4. GHF Associates and its engineers had devised a thor-

. . . .  
- 3. - (a) 4. continued

oughly unique, first-ever technology for solving most crimes in southern Florida. Approximately \$150,000 in cash and two years of intensive research was expended toward this goal. A valient effort was made to re-structure the program but when Southern Bell terminated business and 976 lines which had been bought and engineered at considerable expense, prospects were dimmed. The fatal blow occurred when Southern Bell refused to accept a new order to acquire 976 lines.

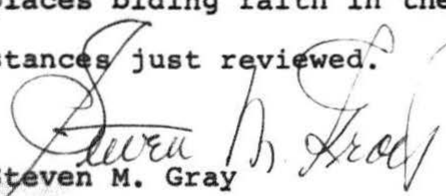
(c) 1. Tariff A12.1.2. (L): Suspension of ESSX lines.

Suspension of ESSX lines are permissible but limited to a percentage of the lines. I was never told that I could have this option.

2. Southern Bell acted contrary to specific instructions given to their Business Office at the time stated. The responding Operator gave no indication whatever that such an order was required by their Company to be received and processed by a specific ESSX department office. An explanation was given to the Petitioner that the first Operator had no authority and that I was derelict in that I had not read the Contract wherein I would have discovered that all ESSX communications were conducted at a specific location.

(c) 4. The Petitioner requests the Commission to allow the recovery of \$4,524.33 with the same rate of interest as imposed by Southern Bell upon its subscribers, and a dissolution of the claimed balance of \$8,250. Further, The Petitioner seeks to recover \$3,000. paid to Southern Bell for its prime 976 line and \$640 with interest for Southern Bell's engineering of these lines from its 976 offices to Coral Gables. Additionally, the Petitioner requests the re-instatement of his original 'good' numbers: 447-0000, 447-0001 and 447-0002 which have been held in abeyance.

Petitioner has no further requests of the Commission and places biding faith in their understanding of the circumstances just reviewed.

  
Steven M. Gray

SMG:sp