

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Comprehensive Review of the)
Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone & Telegraph Company)

Docket No. 920260-TL
Filed: July 10, 1992

**ORIGINAL
FILE COPY**

**PETITION OF THE FLORIDA CONSUMER ACTION NETWORK
FOR LEAVE TO INTERVENE**

The Florida Consumer Action Network, through the undersigned counsel and pursuant to Florida Administrative Code Rule 25-22, hereby files this Petition for Leave to intervene in the above-referenced proceeding and in support thereof states:

1. The affected agency is the Florida Public Service Commission, 101 East Gaines Street, Tallahassee, Florida 32301.

ACK ✓ 2. The Florida Consumer Action Network (FCAN) is a nonprofit,
AFA 5 grassroots consumer and environmental lobby established to give citizens
APP a greater voice in governmental decision-making processes. FCAN is a
CAF coalition of more than 37,000 members and 47 affiliated organizations
CMU including environmental, civic, labor and senior citizen organizations.
CTR
EAG
LEG 1 W 1774 Its corporate address is 4100 W. Kennedy Blvd. #128, Tampa, Florida
LIM 6 33609, Phone (813) 286-1226. FCAN's primary purpose and reason for
CPC existence is to represent Florida's consumers and to work with
RTH governmental agencies on behalf of the consumers of Florida. FCAN
SIC 1 represents consumers throughout the state of Florida, a substantial number
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of whom, approximating 10,000 members, obtain regulated telecommunications services from Southern Bell Telephone and Telegraph Company ("Southern Bell"). Thus, a substantial number of FCAN's members, especially those residing in areas served by Southern Bell, have a significant interest in paying reasonable rates for telecommunication services provided to them by Southern Bell.

3. In docket 880069-TL the joint petitioners Jack Shreve, Public Counsel, Robert A. Butterworth, Attorney General of the State of Florida, and the American Association of Retired Persons (collectively "Joint Petitioners"), sought specific relief with respect to Southern Bell Telephone and Telegraph Company ("Southern Bell"), including the filing of minimum filing requirements (MFRs) by Southern Bell and the reinstatement of full rate base regulation under Section 364.036(5), Florida Statutes. FCAN sought and received intervenor status in that proceeding, expecting that the Southern Bell rate case would be conducted in that docket.

4. As users of services provided by Southern Bell, the individual members of FCAN are adversely affected by such current rate structuring for Southern Bell, and thus have a significant interest in this proceeding. Since this subject matter of this proceeding is within FCAN's general scope of interest and activity and the relief requested is of a type appropriate for FCAN to receive or request on behalf of its constituent members, FCAN hereby seeks permission to intervene and to participate in the above-referenced proceeding for the purpose of protecting Florida's consumers from unreasonably high telecommunications

rates and charges.

5. FCAN further submits that evidence and information submitted by it will be of material value to the Commission in its determination of the issues involved and that this intervention will not broaden the issues nor cause unnecessary delay.

6. Copies of all documents and pleadings in this case should be served to:

Monte Belote
Florida Consumer Action Network
4100 W Kennedy Blvd #128
Tampa, FL 33609

Dan B. Hendrickson
Post Office Box 1201
Tallahassee, FL 32302

WHEREFORE, the Florida Consumer Action Network hereby petitions for leave to intervene and to be treated as a full party to this proceeding with a right to have notice of and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel.

Respectfully submitted this 10th day of July, 1992.

by 

Dan Brooks Hendrickson
Florida Bar No.: 759510
Post Office Box 1201
Tallahassee, Florida 32302
(904) 878-9065

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following persons on this 10th day of July, 1992.

Marshall Criser, III
BellSouth Telecommunications,
Inc. (Southern Bell Telephone & Telegraph Company)
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Harris B. Anthony
BellSouth Telecommunications,
Inc. (Southern Bell Telephone & Telegraph Company)
150 W. Flagler St., Suite 1910
Miami, FL 33130

Robin Norton
Division of Communications
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

Doug Lackey
BellSouth Telecommunications,
Inc. (Southern Bell Telephone & Telegraph Company)
4300 Southern Bell Center
Atlanta, GA 30375

Mike Twomey
Department of Legal Affairs
Attorney General
The Capitol Bldg., 16th Floor
Tallahassee, FL 32399-1050

Angela Green
Division of Legal Services
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

Edward Paschall
Florida AARP Capital City Task
Force
1923 Atapha Nene
Tallahassee, FL 32301

Charlotte Brayer
Florida AARP
275 John Knox Rd., EE 102
Tallahassee, FL 32303

Richard D. Melson
Hopping, Boyd, Green & Sams
23 South Calhoun Street
P.O. Box 6526
Tallahassee, FL 32314

Charles J. Beck
Deputy Public Counsel
111 West Madison Street, #812
Tallahassee, FL 32399-1400

Michael J. Henry
MCI Telecommunications Corp.
MCI Center
Three Ravinia Drive
Atlanta, GA 30346

Joseph A. McGolthlin
Vicki Gordon Kaufman
McWhirter, Grandoff & Reeves
522 E. Park Ave., Suite 200
Tallahassee, FL 32301

Rick Wright
AFAD
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

Peter M. Dunbar
Haben, Culpepper, Dunbar
& French, P.A.
306 N. Monroe St.
P.O. Box 10095
Tallahassee, FL 32301

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
P.O. Drawer 1657
Tallahassee, FL 32302

Joseph P. Gillan
J. P. Gillan and Associates
P.O. Box 541038
Orlando, FL 32854-1038

Floyd R. Self
Messer, Vickers, Caparello,
French, Madsen & Lewis, P.A.
P.O. Box 1876
215 S. Monroe St., Suite 701
Tallahassee, FL 32302-1876

Chanthina R. Bryant
Sprint
3065 Cumberland Circle
Atlanta, GA 30339

by 
Dan Brooks Hendrickson