

J. Phillip Carver
General Attorney

Southern Bell Telephone
and Telegraph Company
c/o Marshall M. Criser III
Suite 400
150 So. Monroe Street
Tallahassee, Florida 32301
Phone (305) 530-5558

September 10, 1992

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Docket Nos. 910980-TL, 910027-TL and 910529-TL

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of
Petition of Southern Bell Telephone and Telegraph Company, which
we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to
indicate that the original was filed and return the copy to me.
Copies have been served to the parties shown on the attached
Certificate of Service.

Sincerely yours,

J. Phillip Carver
J. Phillip Carver

Enclosures

cc: All Parties of Record
A. M. Lombardo
Harris R. Anthony
R. Douglas Lackey

DOCUMENT NUMBER-DATE

10427 SEP 10 1992

A BELL SOUTH Company

F-PSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 12th day of September, 1992 to:

Pat Kurlin
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Thomas R. Parker, Esq.
GTE Florida Incorporated
Post Office Box 110 MC 7
Tampa, Florida 33601-0110

Alan N. Berg
Senior Attorney
United Telephone Co. of
Florida
Post Office Box 5000
Altamonte Spgs, FL 32715-5000

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Peter M. Dunbar
Haben, Culpepper, Dunbar
& French, P.A.
306 North Monroe Street
Post Office Box 10095
Tallahassee, FL 32301

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
106 East College Avenue
Suite 1410
Tallahassee, Florida 32301

J. Phully (Comm. Sec.)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for a rate increase by United Telephone Company of Florida) Docket No. 910980-TL
In re: Petition by Bonita Springs residents for extended area service between Bonita Springs and the Fort Myers and Naples Exchanges) Docket No. 910027-TL
In re: Request by Pasco County Board of County Commissioners for extended area service between all Pasco County Exchanges) Docket No. 910529-TL
Filed: September 10, 1992

PETITION OF SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.036, Florida Administrative Code, and files its Petition to join in the previously filed protest by United Telephone Co. of Florida ("United"), which protest is directed to that portion of the Florida Public Service Commission ("Commission") Order No. 92-0708-FOF-TL that contains a Proposed Agency Action ordering the implementation of a 25 cent message rate call plan on intercompany routes between Williston (United) and Gainesville (Southern Bell) and Trillachoochee (United) and Brooksville (Southern Bell). In support thereof, Southern Bell states the following:

1. Southern Bell is a telephone company lawfully doing business in the State of Florida whose regulated operations are subject to the jurisdiction of this Commission pursuant to Chapter 364, Laws of Florida.

2. Southern Bell's principal place of business in Florida is 150 W. Flagler Street, Suite 1910, Miami, Florida 33130.

Pleadings and process in this matter may be served upon:

Harris R. Anthony
J. Phillip Carver
c/o Marshall M. Criser III
150 So. Monroe Street, Suite 400
Tallahassee, Florida 32301

3. As set forth in the Petition of United filed August 10, 1992, the above-referenced Proposed Agency Action order does not provide adequate time for the implementation of the call plans that are required therein. Specifically, the portion of the Order at issue does not expressly provide any time frame for the implementation of the plan. Therefore, United and Southern Bell would presumably be required by the Order to implement the above-referenced intercompany routes on the date that the Proposed Agency Action is final. Assuming that this result was intended by the Commission, the Order clearly did not provide adequate time for the implementation of the above-referenced plans.

4. The reasons that the plans could not be implemented within the time frame that is presumably contemplated by the Order are set forth at length in the Petition of United that was filed August 10, 1992. Specifically, there are a variety of logistical impediments to implementing the plans in such an unusually short time frame. These impediments apply equally to prevent Southern Bell from implementing its portion of the plan in so short a time.

5. Accordingly, Southern Bell joins in the request of United for the relief set forth in their Petition, i.e., that Southern Bell (along with United) be allowed until September 12, 1992 to implement the Williston to Gainesville route and until October 17, 1992 to implement the Trillachoochee to Brooksville route. If this matter can be resolved without a hearing, then Southern Bell will withdraw this Petition.

WHEREFORE, Southern Bell requests that the Proposed Agency Action section of Commission Order No. PSC-92-0708-FOF-TL be modified to allow Southern Bell until September 12, 1992, to implement the calling plan of the Williston to Gainesville route and until October 17, 1992, to implement the calling plan of the Trillachoochee to Brooksville route.

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

Harris R. Anthony
HARRIS R. ANTHONY
General Counsel-Florida
c/o Marshall M. Criser III
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 530-5555

J. Phillip Carver
J. PHILLIP CARVER
General Attorney
c/o Marshall M. Criser III
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 530-5558