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REPLY TO: Tallahassee

November 4, 1992

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

HAND DELIVERED

Re: FPSC Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed for filing are an original and fifteen copies of Florida Pay Telephone Association, Inc.'s Petition to Intervene in the above-referenced docket.

Please date stamp the extra copy of this letter enclosed to indicate this filing and return the copy to me. Thank you for your assistance in the processing of this filing, and please call if there are any questions or further requirements.

- ACK
- AFA
- APP
- CAF
- CMH
- CTR
- EAG
- LEG
- LIN
- PTD
- RCM
- SEC
- WFS
- OTH

Yours very truly,

Laura L. Wilson
Laura L. Wilson

LLW:sb\tribble.tlt

Enclosures

cc: Parties of Record
Mr. Lance C. Norris

DOCUMENT NUMBER-DATE

12984 NOV-4 1992

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 920260-TL

Filed: November 4, 1992

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

Florida Pay Telephone Association, Inc. ("FPTA"), pursuant to Florida Administrative Code Rule 25-22.039, hereby petitions the Florida Public Service Commission ("Commission") to allow it to intervene in this proceeding. In support thereof, FPTA states:

1. The complete name and address of the petitioner is:

Mr. Lance C. Norris, President
Florida Pay Telephone Association, Inc.
Suite 202, 8130 Baymeadows Circle, West
Jacksonville, Florida 32256

2. All notices, pleadings, orders, and other documents should be provided to the individuals listed below:

Mr. Lance C. Norris, President Fla. Pay Telephone Ass'n, Inc. Suite 202 8130 Baymeadows Circle, West Jacksonville, FL 32256	Laura L. Wilson, Esq. Messer, Vickers, Caparello, Madsen & Lewis, P.A. P. O. Box 1876 Tallahassee, FL 32302-1876
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3. FPTA is a domestic not-for-profit corporation organized pursuant to Florida Statutes chapter 617. The membership of FPTA includes Commission certificated providers of local and intrastate pay telephone service.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

4. On July 15, 1992, BellSouth Telephone and Telegraph Company d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell") filed its Petition for Order Adopting Plan for Alternative Method of Regulation with the Commission. The FPTA and its individual members are directly and substantially affected by Southern Bell's proposed price regulation proposal.

5. First, Southern Bell's price regulation proposal sets certain pricing rules for basic and non-basic services. For services classified as basic services, annual service category increases of 5% would be permitted. For certain non-basic services, annual price increases of 20% would be allowed. Tariffed services provided to non-LEC pay telephone providers fall under both types of service categories. Over the next four years, Southern Bell's proposal would permit a price increase for NPATS services of over 100%. Thus, Southern Bell's proposal directly and substantially impacts FPTA and its members, and FPTA has a strong interest in ensuring that Southern Bell's rate proposal is fair, just and reasonable.

6. Second, section 364.036(2), Florida Statutes, requires that every proposal for an alternative method of regulation meet seven criteria before Commission approval is forthcoming. In this proceeding, Southern Bell must demonstrate that its proposal for alternative method of regulation provides: (1) identifiable benefits to consumers not otherwise available under existing regulatory procedures; (2) effective safeguards to consumers of telecommunications services, including consumers of local exchange access services; (3) assurances that rates for monopoly services are just, reasonable, and not unduly discriminatory, and do not yield excessive compensation; and (4)

adequate safeguards to assure that the rates for monopoly services do not subsidize competitive services. Section 364.036(2)(c)-(f), Fla. Stat. The members of FPTA are both consumers of Southern Bell's regulated telecommunications services, i.e., pay telephone access lines, screening, blocking, billing and collection, long distance, and other related services, as well as competitors with Southern Bell's own pay telephone service. Undeniably, FPTA members have a substantial interest in ensuring that the statutory criteria for approval of an alternative method of regulation are met.

7. FPTA's participation will also facilitate and supplement discovery of important and relevant information critical to the Commission's informed decision on the issued included in this docket.

WHEREFORE, based on the foregoing, Florida Pay Telephone Association, Inc., respectfully requests that it be given leave to intervene as a full party to this proceeding.

Respectfully submitted,

MESSER, VICKERS, CAPARELLO,
MADSEN, LEWIS, GOLDMAN & METZ, P.A.
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KENNETH A. HOFFMAN, ESQ.
LAURA L. WILSON, ESQ.

:sb\920260.int

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida Pay Telephone Association, Inc.'s Petition to Intervene in Docket No. 920260-TL has been sent by Hand Delivery (*) and/or U.S. Mail on this November 4, 1992 to the following parties of record:

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