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June 7, 1993

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

Re: Docket No. 921193-TL - Palm Beach County EAS

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for Modification of Order No. PSC-93-0029-PCO-TL, 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

ACK \_\_\_\_\_

AFA \_\_\_\_\_

APP \_\_\_\_\_

CAE \_\_\_\_\_  
Enclosures

CMU \_\_\_\_\_

cc: All Parties of Record

CTR \_\_\_\_\_ A. M. Lombardo

EAG \_\_\_\_\_ Harris R. Anthony

LEG \_\_\_\_\_ 1 R. Douglas Lackey

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RECEIVED & FILED

SEC \_\_\_\_\_

WAS \_\_\_\_\_

OTHER \_\_\_\_\_  
FLORIDA BUREAU OF RECORDS

A BELLSOUTH Company

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 921193-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this <sup>7<sup>th</sup></sup> day of *June*, 1993  
to:

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

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106 East College Avenue  
Suite 1410  
Tallahassee, Florida 32301

*J. Phillip Carner*  
(02)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request by Palm Beach ) Docket No. 921193-TL  
County Board of County )  
Commissioners for Extended Area ) Filed: June 7, 1993  
Service Between all Exchanges )  
in Palm Beach County )  
\_\_\_\_\_)

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
MOTION FOR MODIFICATION OF ORDER NO. PSC-93-0029-PCO-TL**

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.037, Florida Administrative Code, and hereby moves the Florida Public Service Commission ("Commission") to modify Order No. PSC-93-0029-PCO-TL, entered in the above-referenced docket, and states as grounds in support thereof the following:

1. On January 6, 1993, this Commission issued Order No. PSC-93-0029-PCO-TL, which directed Southern Bell to prepare and submit within 90 days a traffic study of the routes between all exchanges in Palm Beach County. Thus, under the Order, the required traffic study was due on or before April 6, 1993. Prior to the expiration of the time for filing the study, Southern Bell requested a thirty-day extension of time. The reason for this request was that the unusual complexity of the required study was such that it could not likely be completed by April 6, 1993. A thirty-day extension was granted by this Commission, until May 6, 1993.

2. Prior to May 6, 1993, Southern Bell completed the study as directed. The results of the study, however, were such that

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it appeared that the study was not valid. In other words, the data that the study produced appeared on its face to be inaccurate.

3. Accordingly, Southern Bell requested an additional 30-day extension of time to determine the cause of the problem that resulted in these apparently invalid results, to correct the problem, and to conduct a new study that would yield accurate information. The Commission granted this request on May 20, 1993 by Order No. PSC-93-0764-PCO-TL. Accordingly, the traffic study is now due on June 5, 1993.<sup>1</sup>

4. Southern Bell has now identified the nature of the problem that was discovered on the previous traffic study. This problem is that Southern Bell no longer has access to data for some of the routes listed in the Order that is necessary to provide the Commission with the information required by the Order.

5. Specifically, when Southern Bell first conducted the traffic study on these routes (prior to May 6, 1993), the study reflected no calling volume whatsoever on fourteen routes, each of which terminates in Clewiston, Florida. These routes are as follow:

1. Jupiter/Clewiston
2. Jupiter/Clewiston [pocket]
3. West Palm Beach/Clewiston
4. West Palm Beach/Clewiston [pocket]

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<sup>1</sup> Since June 5, 1993 fell on a Saturday, the due date is the next business day thereafter, June 7, 1993. See, Rule 1.090, Florida Rules of Civil Procedure.

5. Boynton Beach/Clewiston
6. Boynton Beach/Clewiston [pocket]
7. Boca Raton/Clewiston
8. Boca Raton/Clewiston [pocket]
9. Belle Glade/Clewiston
10. Belle Glade/Clewiston [pocket]
11. Pahokee/Clewiston
12. Pahokee/Clewiston [pocket]
13. Delray Beach/Clewiston
14. Delray Beach/Clewiston [pocket]

Within the past thirty days, Southern Bell again conducted a traffic study. The second traffic study again reflected zero calling volume for the fourteen above-listed routes.

6. Each of the above-listed routes are interLATA. (Clewiston is in United's service territory and the seven originating exchanges are in Southern Bell's service territory). Historically, Southern Bell has complied with the requirement to provide interLATA information as part of a traffic study by providing information on interLATA calls carried by American Telephone and Telegraph ("AT&T"). Southern Bell has been able to provide this information because it performed the recording and rating of these interLATA calls for AT&T and, accordingly, had access to this information for this reason.

7. On certain routes, however, Southern Bell no longer performs these functions for AT&T. Specifically, Southern Bell has ascertained that it does not perform the recording and rating for AT&T of interLATA calls that terminate in the Clewiston exchange. Accordingly, Southern Bell no longer has data, nor does it have the access to data, that would allow it to provide the Commission with the requested information from AT&T as to calls on the above-referenced routes.

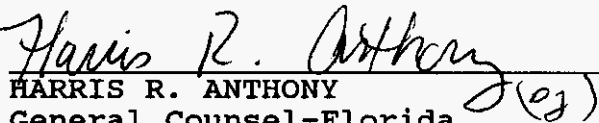
8. Since Southern Bell does not have this information, it cannot comply with the requirement of Order No. PSC-93-0029-PCO-TL to provide this information. For this reason, Southern Bell submits that it would be appropriate for the Commission to modify this Order to relieve Southern Bell from the requirement set forth therein to provide this information as to the above-referenced routes.

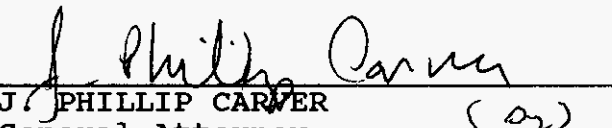
9. The required information for each of the routes identified in the Order, other than fourteen routes listed above, has been compiled, as ordered, and is being filed with the Commission on this date.

WHEREFORE, Southern Bell Telephone and Telegraph Company respectfully requests that this Commission grant its Motion to Modify Order No. PSC-93-0029-PCO-TL.

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND  
TELEGRAPH COMPANY

  
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