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June 21, 1993

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

Re: Extended Area Service
Dockets No. 930173-TL, 930234-TL,
and 930235-TL

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for Stay of Orders Requiring Traffic Studies, 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,

J. Phillip Carver
J. Phillip Carver

ACK _____
AFA _____
APP _____
CAF _____

CMU / Enclosures

CTR _____
EAG _____ cc: All Parties of Record
LEG 1 _____ A. M. Lombardo
LIN 6 _____ Harris R. Anthony
_____ R. Douglas Lackey

OPC _____

RCH RECEIVED & FILED

SEC 1 _____

WAS 88 _____
BUREAU OF RECORDS

OTH _____

A BELL SOUTH Company

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

Docket No. 930173-TL

Docket No. 930234-TL

Docket No. 930235-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 21st day of June, 1993
to:

J. Adams
Staff Counsel
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

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J. Phillip Carver
(02)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by the residents of Polo Park requesting extended area service (EAS) between the Haines City exchange and the Orlando, West Kissimmee, Lake Buena Vista, Windermere, Reedy Creek, Winter Park, Clermont, Winter Garden and St. Cloud exchanges.) Docket No. 930173-TL

In re: Resolution by the Lake County Board of Commissioners for extended area service (EAS) between the Mt. Dora exchange and the Sanford, Geneva, and Oviedo exchanges.) Docket No. 930234-TL

In re: Resolution by the Taylor County Board of Commissioners for countywide extended area service (EAS) within Taylor County.) Docket No. 930235-TL

Filed: June 21, 1993

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION FOR STAY OF ORDERS REQUIRING TRAFFIC STUDIES**

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 respectfully moves the Florida Public Service Commission ("Commission") to stay Orders No. PSC-93-0434-PCO-TL, No. PSC-93-0437-PCO-TL and No. PSC-93-0464-PCO-TL, issued in the above-referenced dockets, and states as grounds in support thereof the following:

DOCUMENT NUMBER-DATE

06661 JUN 21 83

FPSC-RECORDS/REPORTING

1. In Docket No. 921193-TL, In re: Request by Palm Beach County Board of County Commissioners for Extended Area Service Between all Exchanges in Palm Beach County, this Commission ordered Southern Bell to prepare a traffic study of the routes between all exchanges in Palm Beach County. Order No. PSC-93-0029-PCO-TL. Southern Bell performed this study twice, and each time the study reflected zero calling volume on fourteen different interLATA routes.

2. Southern Bell subsequently discovered that its records reflected no calling volume on these interLATA routes because it no longer performs recording and rating for American Telephone and Telegraph ("AT&T") of interLATA calls on the routes in question. Since Southern Bell no longer performs this function, it no longer has the data, nor does it have access to the data, that would allow it to provide the Commission with the requested information regarding the interLATA traffic routes in Palm Beach County.

3. Accordingly, Southern Bell filed, on June 7, 1993, a motion requesting that the Commission modify the pertinent order to relieve Southern Bell of the obligation to provide information on these interLATA routes. Since the filing of this motion, Southern Bell has conferred with the Florida Public Service Commission Staff ("Staff") as well as representatives of AT&T in

an effort to find a way to supply the Commission with the necessary information for these interLATA routes. That effort, however, is ongoing, and no resolution has yet been reached.

4. Traffic studies involving only interLATA routes are due in each of the three above referenced dockets, either on this date or within the next few days. Specifically, traffic studies are due on this date in Docket Nos. 930235-TL and 930173-TL under the terms of, respectively, Orders Nos. PSC-93-0434-PCO-TL and No. PSC-93-0437-PCO-TL. A traffic study is due in Docket No. 930234-TL under the terms of Order No. PSC-93-0464-PCO-TL, on June 24, 1993. Again, all of the routes for which Southern Bell is to perform traffic studies in these three dockets are interLATA.

5. Southern Bell has conducted traffic studies for all of the routes involved in the above-referenced dockets. These traffic studies reflect zero calling volume for all of these interLATA routes. It appears that the fact that Southern Bell no longer performs recording and rating for AT&T is, again, the reason for the zero calling volume that is reflected in the above-referenced studies.


6. As set forth above, Southern Bell is working with the PSC Staff to find a solution to the problem that first appeared in Docket No. 921193-TL, and which is also the reason for the


traffic study results in these dockets. Therefore, it would be appropriate for this Commission to stay, until a solution to this problem has been found, the requirement of each of the three above-referenced orders entered in these three dockets that Southern Bell submit traffic studies on interLATA routes.

WHEREFORE, Southern Bell respectfully requests the entry of an Order staying the portion of the above identified orders entered in these three dockets that require Southern Bell to conduct and file traffic studies.

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY


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