

Harris R. Anthony
General Counsel - Florida

FILE COPY

BellSouth Telecommunications, Inc.
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Suite 1910
150 West Flagler Street
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Phone (305) 347-5555

January 5, 1994

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

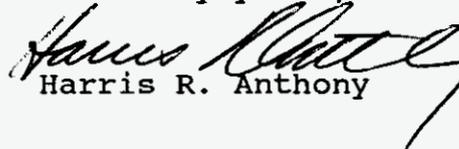
Re: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed please find an original and twenty copies of Southern Bell Telephone and Telegraph Company's Joint Motion for Continuance of Hearings and Stay of Discovery, 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,


Harris R. Anthony

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Enclosures

1 cc/m All Parties of Record
6 A. M. Lombardo
R. Douglas Lackey

Comm 5 J J
Barr 1
Salbott 1

DOCUMENT NUMBER-DATE
00155 JAN-5 94
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of) Docket No. 910163-TL
Citizens of the State of Florida)
to initiate investigation into)
integrity of Southern Bell)
Telephone and Telegraph Company's)
repair service activities and)
reports.)

In re: Comprehensive Review of) Docket No. 920260-TL
the Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone & Telegraph Company)

In re: Investigation into Southern) Docket No. 900960-TL
Bell Telephone and Telegraph)
Company's Non-Contact Sales)
Practices)

In re: Investigation into) Docket No. 910727-TL
Southern Bell Telephone and)
Telegraph Company's Compliance) Filed: January 5, 1994
with Rule 25-4.110(2) (Rebates))

**JOINT MOTION FOR CONTINUANCE
OF HEARINGS AND STAY OF DISCOVERY**

COME NOW The Office of Public Counsel (the "OPC") and BellSouth Telecommunications, Inc., doing business as Southern Bell Telephone and Telegraph Company ("Southern Bell"), pursuant to Rule 25-22.037, Florida Administrative Code, and hereby file this Joint Motion for Continuance of Hearings and Stay of Discovery in the above-captioned cases. In support thereof, the OPC and Southern Bell show the Florida Public Service Commission (the "FPSC") the following:

1. Hearings are currently scheduled to begin on January 24, 1994, in the following four dockets: FPSC Docket No. 920260-TL, Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph

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Company; Docket No. 900960-TL, Investigation into Southern Bell Telephone and Telegraph Company's Non-Contact Sales Practices;
Docket No. 910163-TL, Petition on behalf of Citizens of the State of Florida to Initiate Investigation into Integrity of Southern Bell Telephone and Telegraph Company repair service activities and reports; and Docket No. 910727-TL Investigation into Southern Bell Telephone and Telegraph Company's Compliance with Rule 25-4.110(2) (Rebates), all of which have been consolidated into Docket No. 920260-TL for the purpose of conducting hearings. (These dockets will hereinafter be collectively referred to as the "Southern Bell Rate Case.") Pursuant to the FPSC's procedural orders, all discovery in the Southern Bell Rate Case is scheduled to end on January 14, 1994.

2. The OPC and Southern Bell are filing contemporaneously with this Joint Motion for Continuance of Hearings and Stay of Discovery, a Joint Motion asking the FPSC to adopt in toto a Stipulation and Agreement reached between the OPC and Southern Bell. Adoption of this Stipulation and Agreement, which is in the best interests of Southern Bell's ratepayers, will resolve all pending issues in the Southern Bell Rate Case, with the exception of toll relief for toll routes between Broward and Dade Counties.

3. Because adoption of the Stipulation and Agreement will resolve all issues but for the one noted above, the OPC and Southern Bell believe that it would be appropriate for the FPSC to grant a continuance of the currently scheduled hearing dates.

The efforts of all parties to these hearings, as well as of the FPSC and its Staff, should be directed towards obtaining adoption of the Stipulation and Agreement. To the extent that the hearing dates remain as currently scheduled, the parties will have to devote significant attention to preparing for the trial of the Southern Bell Rate Case. This would have the unfortunate consequence of diverting efforts away from the resolution, as set forth in the Stipulation and Agreement, of the issues pending in the Southern Bell Rate Case, which should be the first priority of all persons interested in that case. The OPC and Southern Bell, therefore, respectfully request that the hearings in this matter be postponed indefinitely.

4. Under these circumstances, further discovery in the Southern Bell Rate Case would not be an efficacious use of the parties' time and resources. Accordingly, the OPC and Southern Bell further respectfully request that the FPSC stay indefinitely all discovery in the Southern Bell Rate Case, with the exception of any relating solely to toll relief for toll routes between Broward and Dade Counties. In the unlikely event that the Stipulation and Agreement is not adopted by the FPSC and the hearings are rescheduled, discovery could then be resumed at the appropriate time.

WHEREFORE, the OPC and Southern Bell respectfully request that the hearings in Southern Bell's rate case be continued and that discovery, except insofar as it may relate to toll relief

for toll routes between Broward and Dade Counties, be stayed indefinitely.

THE OFFICE OF PUBLIC COUNSEL

By Charles J. Beck
Charles J. Beck
Deputy Public Counsel

BELLSOUTH TELECOMMUNICATIONS,
INC. D/B/A SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY

By Harris R. Anthony
Harris R. Anthony
General Counsel-Florida

CERTIFICATE OF SERVICE

Docket No. 920260-TL

Docket No. 900960-TL

Docket No. 910163-TL

Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 5 day of Jan., 1994
to:

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