



Michael W. Tye
Senior Attorney

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FILE COPY

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904 425-6360

January 12, 1993

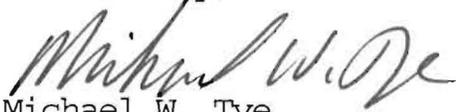
Mr. Steven C. Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399

Re: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed for filing in the above referenced docket are one (1) original and fifteen (15) copies of the Joint Motion and Response to Public Counsel's and Southern Bell's Joint Motion to Approve Stipulation and Agreement. Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Yours truly,


Michael W. Tye

- ACK _____
- AFA 2 _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 1 _____
- LIN 6 _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTI _____

MWT:sad

Attachments

cc: Parties of Record

RECEIVED & FILED

14F
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00406 JAN 12 93

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition on behalf of
Citizens of the State of Florida
to initiate investigation into
integrity of Southern Bell
Telephone and Telegraph Company's
repair service activities and
reports.

) Docket No. 910163-TL

In re: Comprehensive Review of
the Revenue Requirements and Rate
Stabilization Plan of Southern
Bell Telephone & Telegraph Company.)

) Docket No. 920260-TL

In re: Investigation into
Southern Bell Telephone and
and Telegraph Company's
Non-Contract Sales Practices.

) Docket No. 900960-TL

In re: Investigation into Southern
Bell Telephone and Telegraph
Company's Compliance With Rule
25-4.110(2) (Rebates).

) Docket No. 910727-TL

) FILED: January 12, 1994

JOINT MOTION AND RESPONSE TO PUBLIC COUNSEL'S AND SOUTHERN
BELL'S JOINT MOTION TO APPROVE STIPULATION AND AGREEMENT

COME NOW AT&T Communications of the Southern States, Inc. ("AT&T"), MCI Telecommunications Corporation ("MCI"), Sprint Communications Company Limited Partnership ("Sprint"), the Florida Interexchange Carriers Association ("FIXCA"), the Florida Ad Hoc Telecommunications Users' Committee ("Ad Hoc"), the Florida Pay Telephone Association, Inc. ("FPTA"), the Florida Cable Television Association, Inc. ("FCTA"), the United States Department of Defense/Federal Executive Agencies ("DOD"), and McCaw Cellular Communications of Florida, Inc. ("McCaw") (hereinafter referred to

DOCUMENT NUMBER-DATE

00406 JAN 12 8

FPSC-RECORDS/REPORTING

as the "PARTIES"), pursuant to Rule 25-22.037, Florida Administrative Code, and hereby file this Joint Motion to have the Florida Public Service Commission approve the Stipulation and Agreement Between the Office of Public Counsel and Southern Bell Telephone and Telegraph Company (the "Stipulation") and the Implementation Agreement for Portions of the Unspecified Rate Reductions in the Stipulation and Agreement Between the Office of Public Counsel and Southern Bell Telephone and Telegraph Company ("Implementation Agreement") executed by the PARTIES to this motion and Response to Southern Bell's and Public Counsel's Joint Motion to Approve Stipulation and Agreement. In support of this Joint Motion and Response, the parties state:

1. Southern Bell and the Office of Public Counsel have previously filed a joint motion seeking approval of the Stipulation.

2. The Implementation Agreement implements portions of the revenue reductions in paragraphs 5 and 6 of the Stipulation and identifies the timetable and procedures by which the application of the remainder of portions of the rate reduction dollars identified in paragraph 10 of the Stipulation should be determined.

3. The PARTIES support the approval of the Stipulation if, but only if, the Commission simultaneously approves the Implementation Agreement. If the Commission does not approve the Stipulation and the Implementation Agreement in their entirety, the PARTIES do not support the Stipulation above and object to the approval of the Stipulation without a full hearing on all matters, including but not limited to rate design, addressed by the Stipulation.

4. Moreover, if the Commission does not approve the Stipulation and Implementation Agreement in their entirety, the PARTIES object to the Joint Motion for Continuance of Hearings and request that the Commission proceed to hearing as currently scheduled.

WHEREFORE, the parties hereto respectfully request that the Commission approve the Stipulation and Implementation Agreement.

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.

By Michael W. Tye
Michael W. Tye, Esq.

MCI TELECOMMUNICATIONS CORPORATION

By Cheryl Stuart for
Michael J. Henry, Esq.

SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP

By Chanthina R. Bryant
for Chanthina R. Bryant, Esq.

THE FLORIDA INTEREXCHANGE CARRIERS ASSOCIATION

By Vicki Gordon Kaufman
Vicki Gordon Kaufman Esq.

THE FLORIDA AD HOC TELECOMMUNICATIONS
USERS' COMMITTEE

By _____
Douglas S. Metcalf

THE FLORIDA PAY TELEPHONE ASSOCIATION

By *Kenneth A. Hoffmann*
Kenneth A. Hoffmann, Esq.

THE FLORIDA CABLE TELEVISION
ASSOCIATION

By *Laura L. Wilson*
Laura L. Wilson, Esq.

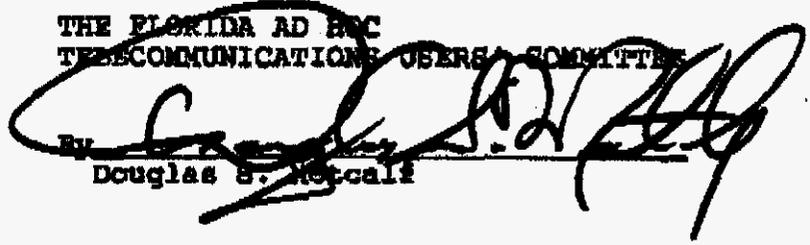
THE UNITED STATES DEPARTMENT OF
DEFENSE/FEDERAL EXECUTIVE AGENCIES

By _____
Peter Q. Nyce, Jr., Esq.

McCAW CELLULAR COMMUNICATIONS OF
FLORIDA, INC.

By *Floyd R. Self*
Floyd R. Self, Esq.

THE FLORIDA AD HOC
TELECOMMUNICATIONS USERS COMMITTEE

By 
Douglas S. Metcalf

THE FLORIDA PAY TELEPHONE
ASSOCIATION

By _____
Kenneth A. Hoffman, Esq.

THE FLORIDA CABLE TELEVISION
ASSOCIATION

By _____
Laura L. Wilson, Esq.

THE UNITED STATES DEPARTMENT OF
DEFENSE/FEDERAL EXECUTIVE AGENCIES

By _____
Peter Q. Nyce, Jr., Esq.

McCAW CELLULAR COMMUNICATIONS OF
FLORIDA, INC.

By _____
Floyd R. Self, Esq.

THE FLORIDA AD HOC
TELECOMMUNICATIONS USERS' COMMITTEE

By _____
Douglas E. Netcalf

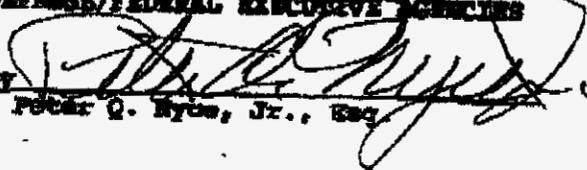
THE FLORIDA PAY TELEPHONE
ASSOCIATION

By _____
Kenneth A. Hoffman, Esq.

THE FLORIDA CABLE TELEVISION
ASSOCIATION

By _____
Laura L. Wilson, Esq.

THE UNITED STATES DEPARTMENT OF
DEFENSE/FEDERAL EXECUTIVE AGENCIES

By 
Peter Q. Nybo, Jr., Esq.

MOBILE CELLULAR COMMUNICATIONS OF
FLORIDA, INC.

By _____
Floyd R. Self, Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Joint Motion has been furnished by hand delivery* or by U.S. Mail to the following parties of record, this 12th day of January, 1994:

Angela B. Green*
Division of Legal Services
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399

Marshall M. Criser
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Charles J. Beck
Deputy Public Counsel
Office of Public Counsel
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and Cowdery
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Tallahassee, FL 32308


Michael W. Tye, Esq.