

Mark Richard  
Attorney At Law

ORIGINAL  
FILE COPY

March 24, 1994

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

Re: Docket Nos. 910163-TL  
920260-TL  
900960-TL  
910727-TL

Dear Mr. Tribble:

Enclosed please find an original and ten (10) copies of my clients' Motion for Oral Arguments on Motion to Dismiss and on Proposal for Implementation of \$10 Million Reduction. Please file same.

ACK  Thank you.

AEA

AFP

CAF

CMU

CVR

SGC MR:bes

LEG Enclosures

URI cwa/tribble2.ltr

CFC

RDR

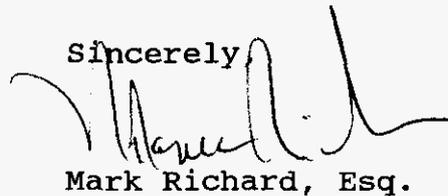
SEC

WAS

OTH

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Sincerely



Mark Richard, Esq.

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DOCUMENT NUMBER-DATE  
02973 MAR 30 1994  
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 and 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 Southern ) Docket No. 910727-TL  
Bell Telephone and Telegraph )  
Company's Compliance with Rule )  
25-4.110(2) (Rebates). )

**REQUEST FOR ORAL ARGUMENTS ON MOTION TO DISMISS AND ON PROPOSAL  
FOR IMPLEMENTATION OF \$10 MILLION REDUCTION BY LOCALS 3121,  
3122, 3107 COMMUNICATION WORKERS OF AMERICA, AFL-CIO**

COMES NOW Locals 3121, 3122 and 3107 Communication Workers of  
America, AFL-CIO ("CWA"), by and through their undersigned counsel,  
and requests oral orgument on Southern Bell Telephone and Telegraph  
Company's ("Southern Bell") Motion to Dismiss and CWA's Proposal,  
and states:

1. As expected, Southern Bell, with just a few blank pages  
and a word processor, arrogantly ignores the import that underlies  
the CWA proposal. CWA, representing thousands of workers and  
citizens, submitted its proposal with great thought.

2. Every time "interested parties" are invited to  
participate in dockets, they are rarely taken seriously. It is as  
if the allowance of others to participate is only a facade. If no

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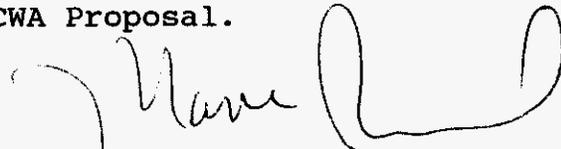
FPSC-RECORDS/REPORTING

one participates, then Southern Bell makes much of their democratic stance. However, if a party actually takes the "interested party" status seriously, then Southern Bell automatically uses its corporate muscle to wipe them out.

3. Southern Bell's motion is misplaced. There is no statutory authority prohibiting the Commission from protecting workers and rate payors. CWA purposely acknowledged that the structure of its proposal was subject to Commission approval. Additionally, assuming arguendo that Southern Bell is correct, nothing prohibits the Commission from altering the CWA proposal in such a fashion as to comply with the law.

4. CWA deserves to at least orally present its plan to the Commission. Further, CWA equally deserves to orally argue against the meritless Southern Bell Motion to Dismiss.

WHEREFORE, CWA Locals pray for oral argument on the Southern Bell Motion to Dismiss and the CWA Proposal.

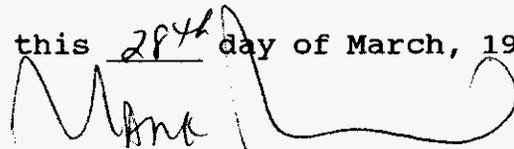


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Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing Proposal for Implementation was mailed to those individuals named on the attached distribution list on this 28<sup>th</sup> day of March, 1994.



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MARK RICHARD, ESQ.

SERVICE LIST

Docket No. 920260-TL  
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Docket No. 910727-TL

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