

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 920260-TL

Filed: April 12, 1994

**RESPONSE OF FMCA TO SOUTHERN BELL'S  
PROPOSAL FOR DISPOSITION OF 1994  
UNALLOCATED RATE REDUCTIONS AND  
ADOPTION OF SOUTHERN BELL'S ALTERNATIVE PROPOSAL**

Florida Mobile Communications Association, Inc. ("FMCA"),  
by its undersigned counsel, files its response to Southern Bell's  
proposal for disposition of 1994 unallocated rate reductions, and  
adoption of Southern Bell's alternative proposal, and in support  
thereof states:

1. FMCA was granted leave to intervene in this docket by  
Commission Order No. PSC-94-0117-PCO-TL.

2. FMCA is an association whose members are radio common  
carriers/paging carriers and other wireless communication service  
providers located throughout Southern Bell's service territory.  
FMCA members obtain facilities and services from Southern Bell  
primarily through Section A35 of Southern Bell's tariff.

3. Many FMCA members subscribe to Southern Bell's optional  
intraLATA Land-to-Mobile (LTM) calling plan provided under Section  
A35.1.6.D.3. of its tariff. The LTM calling plan allows intraLATA  
direct dialed long distance calls and expanded Local Calling Area  
calls to paging numbers to be excluded from originating customers'

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bills, and FMCA then pays a usage rate on the total monthly minutes of use for such calls.

4. Southern Bell's proposal for distribution of the 1994 unallocated rate reductions per Order No. PSC-94-0172-707-TL, filed March 1, 1994, contains in its "alternative proposal"<sup>1</sup> a plan to distribute the \$10 million reductions thusly:

- a) \$7.3 million allocated to reduce mobile service provider usage rates in accordance with Order No. 20475;
- b) \$1.0 million allocated to reduce 800 service usage rates; and
- c) \$1.7 million allocated to reduce Direct Inward Dialing ("DID") trunk termination rates.

5. FMCA believes Southern Bell's alternative proposal is a reasonable, appropriate means of allocating the \$10 million 1994 unallocated rate reductions.

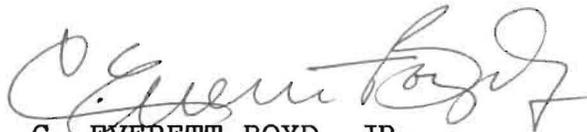
WHEREFORE, Florida Mobile Communications Association respectfully requests that Southern Bell's alternative proposal as set forth above be approved by the Commission to be effective July 1, 1994.

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<sup>1</sup> Southern Bell's alternative proposal is predicated on the assumption that the Commission denies Southern Bell's petition for stay of Order No. 20475 in Docket No. 940220-TL; FMCA has intervened in that docket and urged the Commission to dismiss Southern Bell's petition therein.

DATED this 12<sup>TH</sup> day of April, 1994.

Respectfully submitted,



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**ATTORNEYS FOR FLORIDA MOBILE  
COMMUNICATION ASSOCIATION, INC.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Petition for Leave to Intervene, filed on behalf of Florida Mobile Communication Association, Inc., has been furnished by U.S. Mail on this 12<sup>TH</sup> day of April, 1994, to the following:

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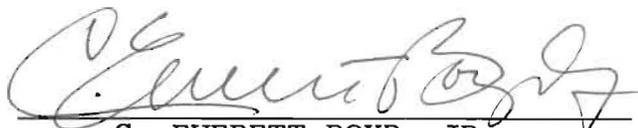
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