

J. Phillip Carver
General Attorney

Southern Bell Telephone
and Telegraph Company
c/o Marshall M. Criser III
Suite 400
150 So. Monroe Street
Tallahassee, Florida 32301
Phone (305) 530-5558

April 18, 1994

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Docket No. 921074-TP - Intermedia's Petition

Dear Mrs. Bayo:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion to Strike Cross Motion for Reconsideration of Teleport Communications Group, Inc., 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. 2 Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely yours,
J. Phillip Carver
J. Phillip Carver (PWC)

Enclosures

w/m
cc: All Parties of Record
A. M. Lombardo
Harris R. Anthony
R. Douglas Lackey

RECEIVED
mas

DOCUMENT DATE
03586 APR 18 94
F. SCOTT SOUTHWEST REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for expanded) Docket No. 921074-TP
interconnection for alternate)
access vendors within local)
exchange company central offices)
by INTERMEDIA COMMUNICATIONS OF)
FLORIDA, INC.)
_____) Filed: April 18, 1994

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION TO STRIKE CROSS MOTION FOR RECONSIDERATION
OF TELEPORT COMMUNICATIONS GROUP INC.**

BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), hereby respectfully requests, pursuant to Rule 25-22.037(2)(a), the entry of an order striking the Cross Motion for Reconsideration of Teleport Communications Group Inc., and states as grounds in support thereof the following:

1. Order No. PSC-94-0285-FOF-TP, states specifically that any motion for reconsideration of this Order was to have been filed on or before March 25, 1994. Teleport Telecommunications Group, Inc. ("Teleport") filed no motion for reconsideration by that date. Instead, Teleport filed on April 6, 1994 what it labeled a "Cross Motion" for reconsideration.

2. Neither the specific Order that was the subject of Teleport's motion, nor the rules of this Commission generally, authorize the filing of a "Cross Motion" for reconsideration at some point after the deadline for filing a Motion for Reconsideration. In essence, Teleport has simply filed a Motion for Reconsideration twelve days after the last proper date for filing the motion and labeled it as if it were something other

03586 MAR 18 1994

SECRETARY OF STATE

than an untimely motion for reconsideration. Accordingly, this motion should be stricken as untimely and improper.

WHEREFORE, Southern Bell respectfully requests the entry of an Order striking Teleport's Cross Motion for Reconsideration.

Respectfully submitted this 18th day of April, 1994.

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY

Harris R. Anthony (handwritten signature)

HARRIS R. ANTHONY
J. PHILLIP CARVER
c/o Marshall M. Criser III
150 So. Monroe Street, Ste. 400
Tallahassee, FL 32301
(305) 347-5555

Mary Jo Peed (handwritten signature)

MARY JO PEED
c/o Marshall M. Criser III
150 So. Monroe Street, Ste. 400
Tallahassee, FL 32301
(404) 529-7208

CERTIFICATE OF SERVICE
Dockets No. 921074-TL, 930955-TL,
940014-TL, 940020-TL, 931196-TL, 940190-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by U. S. Mail this *18th* day of *April* 1994, to:

Tracy Hatch
Division of Communications
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

Charles Murphy
Division of Legal Services
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, Florida 32302

Intermedia Communications
9280 Bay Plaza Blvd., #270
Tampa, FL 33619-4453

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Thomas Parker
GTE Florida Incorporated
P.O. Box 110, MC 7
Tampa, FL 33601-0110

C. Dean Kurtz
Central Tel. Co. of Florida
Post Office Box 2214
Tallahassee, FL 32316-2214

Florida Cable Television
Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

Interexchange Access Carrier
Coalition (IACC)
Brad E. Mutschelknaus
Rachel J. Rothstein
Ann M. Szemplenski
Wiley, Rein, & Fielding
1776 K Street, NW
Washington, D.C. 20006

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff and Reeves
Suite 716
315 South Calhoun Street
Tallahassee, FL 32301

Joseph P. Gillan
J. P. Gillan and Associates
Post Office Box 541038
Orlando, FL 32854-1038

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom &
Ervin
305 South Gasdsen Street
Tallahassee, FL 32301

Chanthina R. Bryant
Sprint
3065 Cumberland Circle
Atlanta, GA 30339

Sprint Communications Co.
Ltd. Partnership
c/o Tony Key, Director
3065 Cumberland Circle
Atlanta, GA 30339

Laura L. Wilson, Esq.
c/o Florida Cable Tele-
vision Association, Inc.
Post Office Box 10383
310 North Monroe Street
Tallahassee, FL 32302

Paul Jones, Esq.
Time Warner Cable
Corporate Headquarters
300 First Stamford Place
Stamford, CT 06902-6732

Peter M. Dunbar
Pennington, Haben, Wilkinson,
Culpepper, Dunlap, Dunbar,
Richmond & French, P.A.
Post Office Box 10095
Tallahassee, FL 32302

Michael W. Tye
Suite 1410
106 East College Avenue
Tallahassee, FL

Harriet Eudy
ALLTEL Florida, Inc.
Post Office Box 550
Live Oak, FL 32060

Lee L. Willis
J. Jeffry Wahlen
John P. Fons
Macfarlane, Ausley, Ferguson
& McMullen
Post Office Box 391
Tallahassee, FL 32302

Charles Dennis
Indiantown Telephone System
Post Office Box 277
Indiantown, Florida 34956

John A. Carroll, Jr.
Northeast Telephone Company
Post Office Box 485
Macclenny, Florida 32063-0485

Daniel V. Gregory
Quincy Telephone Company
Post Office Box 189
Quincy, Florida 32351

Jeff McGehee
Southland Telephone Company
210 Brookwood Road
Post Office Box 37
Atmore, Alabama 36504

Jodie L. Donovan
Regulatory Counsel
Teleport Communications Group
Inc., Ste. 301
1 Teleport Drive
Staten Island, NY 10311

Kenneth A. Hoffman, Esq.
Rutledge, Ecenia, Underwood,
Purnel & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302-0551

F. Ben Poag
United Telephone Company of FL
P.O. Box 165000
Altamonte Springs, FL 32716

Michael J. Henry
MCI Telecommunications Corp.
Suite 700
780 Johnson Ferry Road
Atlanta, GA 30342

Richard D. Melson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, FL 32314

Benjamin H. Dickens, Jr.
Blooston, Mordkofsky, Jackson
& Dickens
2120 L Street, N.W., Suite 300
Washington, DC 20037-1527

Douglas S. Metcalf (Ad Hoc)
Communications Consultants,
Inc., Suite 250
631 S. Orlando Avenue
P.O. Box 1148
Winter Park, FL 32790-11

J. Phillip Carver
J. Phillip Carver (Encl)