

Mark Richard
Attorney At Law

FILE COPY

August 24, 1994

Florida Public Service Commission
Division of Records and Reporting
101 East Gaines Street
Tallahassee, Florida 32301

Re: Docket No. 920260-TL

Dear Sir or Madam:

Enclosed please find an original and fifteen (15) copies of my clients' Motion to Appear by Telephone with respect to the referenced action. Please file same.

Thank you.

Sincerely,

Mark Richard / Bes

Mark Richard

Dictated By Mark Richard
But Signed in His Absence
To Avoid Delay.

RECEIVED & FILED
me
DIVISION OF RECORDS

- ACK ✓
- AFA Joh
- APP _____
- CAF _____
- CMU Norton
- CTR _____
- EAG _____
- LEG Hatch
- LIN 6
- OPC _____
- RCH Vinson
- SEC 1
- WAS _____
- OTH _____

MR: bes
Enclosures

cwa/psc.3

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DOCUMENT NUMBER-DATE

08874 AUG 29 94

FPSC-RECORDS/REPORTING



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of) Docket No. 920260-TL
the Revenue Requirements and Rate)
Stabilization Plan of Southern Bell)
Telephone and Telegraph Company.)
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**COMMUNICATION WORKERS OF AMERICA, AFL-CIO'S MOTION
TO APPEAR BY TELEPHONE**

COMES NOW Locals 3121, 3122 and 3107 Communication Workers of America, AFL-CIO ("CWA"), by and through their undersigned counsel, and files this motion to Appear by Telephone and states:

1. On August 19, 1994 a prehearing conference was held in which Commissioner Clark determined that the PSC was without jurisdiction to hold the September 1, 1994 until the Florida Supreme Court handed down a decision on the PSC's Motion to Dismiss.

2. Commissioner Clark also determined that discovery would continue and CWA would be provided with the time to respond to Southern Bell's most recent Motion to Strike and Motion for Protective Order.

2. The parties that were present agreed that there were numerous discovery matters including CWA's Notice of Deposition of Mr. Joseph Lacher (which was temporarily postponed by Commissioner Clark) and CWA's Request for Production which need resolution by the PSC during the discovery period. As a result it would appear that additional pre-hearing conferences to address the various motions and other issues would be required.

3. The time, expense and previous commitments of the parties to other matters make it extremely difficult to appear by phone.

4. It would serve the interests of judicial economy and the interests of the parties, if parties could appear by phone in order to resolve these numerous discovery matters.

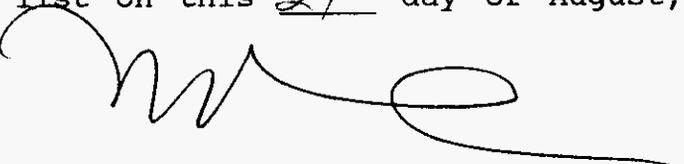
WHEREFORE, Locals 3121, 3122 and 3107 Communication Workers of America, AFL-CIO request the Florida Public Service Commission grant CWA's Motion to Appear by Telephone.



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of America Locals 3121, 3122 and 3107
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Telephone: 305/443-5125

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Appear by Telephone was mailed to those individuals named on the attached distribution list on this 24th day of August, 1994.



MARK RICHARD, ESQ.

cwa/telephone.mot