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FILE COPY

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October 12, 1994

Mrs. Blanca S. Bayo  
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Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

Re: Docket No. 921074-TP, 930955-TL, 940014-TL  
940020-TL, 931196-TL and 940190-TL  
Expanded Interconnection Phase II and LTR

Dear Mrs. Bayo:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for Modification of Page and Word Limits of Rules 25-22.056(1)(d) and 25-22.056(3)(a), 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. Copies have been served to the parties shown on the attached Certificate of Service.

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- LEG  *Conzans*
- LIN  *4*
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- RCH
- SEC  *1*
- WAS
- OTH

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*me*  
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Sincerely yours,  
*J. Phillip Carver (01)*  
J. Phillip Carver

Enclosures  
cc: All Parties of Record  
A. M. Lombardo  
Robert G. Beatty  
R. Douglas Lackey

**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 United States Mail this *12* day of *October* 1994,  
to:

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*J Phillip Conner (es)*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection )	Docket No. 921074-TP
Phase II and Local Transport )	Docket No. 930955-TL
Restructure )	Docket No. 940014-TL
_____ )	Docket No. 940020-TL
	Docket No. 931196-TL
	Docket No. 940190-TL

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
MOTION FOR MODIFICATION OF PAGE AND WORD LIMITS  
OF RULES 25-22.056(1)(d) and 25-22.056(3)(a)**

BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company") hereby respectfully requests, pursuant to Rules 25-22.056(1)(d) and 25-22.056(3)(a), a waiver of the page and word limits in, respectively, Rules 25-22.056(1)(d) and 25-22.056(3)(a), Florida Administrative Code, and states the following:

1. Rule 25-22.056(1)(d) states that a party's post hearing filing (whether designated as a brief or otherwise) shall not exceed sixty pages. This rule also states, however, that this page limit may be exceeded for good cause shown. Southern Bell hereby requests that it be allowed to exceed the page limit on its brief and as good cause states the following.

2. This docket, of course, involves the consolidation of two separate, distinct set of issues, both of which are complex in their own right, (1) expanded interconnection for switched access service and (2) local transport restructure. This consolidated docket includes twenty-five (25) issues (including subparts). Although five of these issues have been stipulated, twenty of them must be briefed. In addition, certain of the issues were the subject of extensive testimony during the almost

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four days of the hearing of this matter. Other issues are legal in nature and require either a complicated constitutional analysis, or an analysis of the applicable Florida law. Also, the Statement of the Case in this matter must necessarily be somewhat more complicated than in most dockets because of the history of these cases.

3. For all the reasons set forth above, it is not possible to adequately brief each of the twenty issues, and to draft a thorough statement of the case, within the sixty page limit. Southern Bell is filing on this date a Brief of 71 pages. Accordingly, Southern Bell requests that the Commission allow it to exceed the sixty page limit by 11 pages.

4. Rule 25-22.056(3)(a) limits the parties' statement of its position in regard to a particular issue to fifty words. This limitation also may be waived for good cause shown. In the brief that Southern Bell is filing on this date, Southern Bell's statement of its position on most of the issues exceeds fifty words.

5. Certainly, Southern Bell could state its position on each of these issues in less than fifty words. Given the complexity of these issues, however, a more succinct statement would simply not be adequate to fully set forth Southern Bell's position. Southern Bell's submits that it is better to allow it to exceed the word limitation on the statement of these issues rather than for Southern Bell to submit statements of its positions that are incomplete in their summary of (or references



to) the discussion that follows. For this reason, Southern Bell requests that the provisions of Rule 25-22.056(3)(a) be modified and it be allowed to exceed the fifty word limit.

WHEREFORE, for the reasons set forth above, Southern Bell respectfully requests the entry of an order allowing it to exceed the sixty page limitation on briefs and to exceed the fifty word limit on statements of positions.

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