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Mark Richard
Attorney At Law

December 21, 1994

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

Re: Docket No. 920260-TL
Locals 3121, 3122 and 3107 Communication
Workers of America, AFL-CIO

Dear Sir or Madam:

Enclosed please find an original and fifteen (15) copies of my clients' Second Motion for Clarification with respect to the referenced docket. Please file same.

Thank you.

ACK _____
AFB Jeh
APP _____
CSP _____
(CPS) Norton
CPI _____
EAB MR:bes
EAC Enclosures
EAG Walter Elias
EAI 4 cwa/psc5.ltr
EAO _____
EAM Vanson
EAP 1
EAS _____
EAT _____
EAW _____
EAX _____
EAY _____
EAZ _____
OTH _____

Sincerely,

Mark Richard / Bes
Mark Richard

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

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DOCUMENT NUMBER-DATE

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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
SECOND MOTION FOR CLARIFICATION**

COMES NOW Locals 3121, 3122 and 3107 Communication Workers of America, AFL-CIO ("CWA"), by and through their undersigned counsel, and files this Second Motion for Clarification and states:

1. On September 2, 1994, CWA filed a Motion to Reset Hearing and Motion for Clarification. As of this date, the PSC has not responded to this Motion.

2. On or about November 28, 1994 the undersigned counsel contacted Tracy Hatch who confirmed that an Order would be served on the parties resolving all previous Motions on discovery and other matters within a week to ten days. As of this date, no order has been entered by the PSC.

3. There are several outstanding motions pertaining to discovery and other matters including CWA's Motion to Appear by Telephone for which a decision has not yet been rendered. In order for CWA to have the opportunity to properly and without prejudice prepare for the hearing in this matter, CWA must be afforded discovery.

6. As a result of the numerous Southern Bell motions, the CWA has been unable to obtain any discovery in this matter or

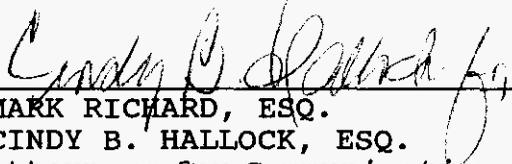
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FPSC-RECORDS/REPORTING

resolve other matters.

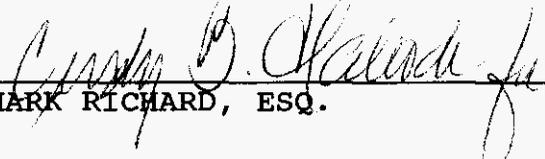
WHEREFORE, Locals 3121, 3122 and 3107 Communication Workers of America, AFL-CIO request the Florida Public Service Commission enter an order clarifying the PSC's position on discovery and all other matters.



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Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Clarification was mailed to those individuals named on the attached distribution list on this 21st day of December, 1994.



MARK RICHARD, ESQ.

cwa/clarif.mot

DISTRIBUTION LIST
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