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March 20, 1995

ORIGINAL
FILE COPY

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

Re: Docket No. 920260-TL

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for Clarification of The Communications Workers of America's Proposal for Implementation of \$25 Million Reduction, which we ask that you file in the captioned matter.

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.

Sincerely,

Robert G. Beatty
Robert G. Beatty
(BW)

ACK ✓

AFA 1

APP _____

CSE Enclosures

CST *Norton*
cc: All Parties of Record

CTR _____ A. M. Lombardo

EAG _____ R. Douglas Lackey

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OST _____

RY Vinson

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02960 MAR 20 1995
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CERTIFICATE OF SERVICE
Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this *20th* day of *March*, 1995 to:

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Robert G. Beatty

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive review of)
revenue requirements and rate)
stabilization plan of Southern)
Bell Telephone and Telegraph)
Company)

Docket No. 920260-TL

Filed: March 20, 1995

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION FOR CLARIFICATION OF THE COMMUNICATIONS WORKERS OF
AMERICA'S PROPOSAL FOR IMPLEMENTATION OF \$25 MILLION REDUCTION

BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell") moves the Florida Public Service Commission ("Commission") to dismiss the Communications Workers of America's ("CWA") Proposal for Implementation of \$25 Million Reduction for the reasons set forth below.

1. By Order No, PSC-94-0172-FOF-TL, dated February 11, 1994, ("the Order") the Commission approved and incorporated by reference the Stipulation and Agreement Between the Office of Public Counsel and Southern Bell, as well as the Implementation Agreement for Portions of the Unspecified Rate Reductions in Stipulation and Agreement Between the Office of Public Counsel and Southern Bell (collectively, the "Settlement").

2. The Settlement, while effectively settling the issues in the above captioned docket, left certain sums of money available for disposition in 1994, 1995, and 1996. The Settlement allowed all interested parties to submit proposals as to how the unspecified rate reductions for each of three years should be implemented.

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3. The Implementation Agreement paragraph 4, provides in pertinent part as follows:

The PARTIES agree that the Commission shall conduct hearings to determine that the rate design by which the amount not specifically allocated by the Stipulation of this Implementation Agreement shall be disposed of in 1994 (\$10 million), 1995 (\$25 million), and 1996 (approximately \$48 million). To the extent not limited herein, the PARTIES or any other interested persons shall submit, not less than 120 days prior to the scheduled effective date of each reduction, their proposals as to how such reductions should be implemented....

The Stipulation and Agreement, paragraph 5c, sets October 1, 1995, as the scheduled effective date of the 1995 reduction. Thus, Southern Bell, as well as any other interested party, has 120 days prior to October 1, or until June 3, 1995, to file its proposal to determine the rate design for the \$25 million that was allocated by the Settlement for 1995.

4. On February 23, 1995, CWA filed its proposal for rate design of the \$25 million to be allocated for 1995. CWA also requests that the Commission conduct a hearing on their proposal and that it be notified and permitted to participate in the hearing.

5. Southern Bell requests that the Commission clarify that it will not issue an order on the merits of CWA's proposal, or take any other action prior to the submission of rate design proposals by other parties.

WHEREFORE, Southern Bell requests that the Commission issue an Order clarifying or declaring that no action will be taken until all proposals are received by the Commission.

Respectfully submitted this 20th day of March, 1995.

SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

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