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**Mark Richard**  
Attorney At Law

**ORIGINAL  
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June 26, 1995

Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

Attention: Director  
Division of Records & Reporting

Re: Docket No. 920260-TL  
Southern Bell/Locals 3121, 3122 and 310  
Communication Workers of America, AFL-CIO

Dear Sir or Madam:

Enclosed for filing are an original and fifteen (15) copies of the Pre-Hearing Statement of Locals 3121, 3122, 3107 Communication Workers of America, AFL-CIO.

Copies of the Pre-Hearing Statement were mailed today to those individuals named on the attached distribution list.

- ACK \_\_\_\_\_
- AFA 2 Thank you.
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Berton
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG / MR:bes
- LIN 5 Enclosures
- OPC --- cwa/psc2.3
- RCH Kenson
- SEC L
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Sincerely,

*Mark Richard / Bes*  
Mark Richard

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

Richard Legal Plan, PA  
304 Palermo Avenue, Coral Gables, Florida 33134  
(305) 442-8772  
(305) 443-5125

DOCUMENT NUMBER-DATE

06101 JUN 29 95

FPSC-RECORDS/REPORTING

Docket No. 920260-TL

Distribution List

Robin Norton  
Division of Communications  
Florida Public Service Comm.  
101 E. Gaines Street  
Tallahassee, FL 32399-0866

Tracy Hatch, Esq.  
Robert Elias, Esq.  
Florida Public Service Comm.  
101 East Gaines St.  
Tallahassee, FL 32399-0863

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Grandoff & Reeves  
315 S. Calhoun St., #716  
Tallahassee, FL 32302

Michael W. Tye  
AT&T Communications of the  
Southern States, Inc.  
106 E. College Ave., #1410  
Tallahassee, FL 32301

Dan B. Hendrickson  
P.O. Box 1201  
Tallahassee, FL 32302

Robert G. Beatty  
J. Phillip Carver  
c/o Nancy Sims  
Southern Bell Telephone  
and Telegraph Co.  
400 - 150 S. Monroe St.  
Tallahassee, FL 32301

Robert G. Beatty  
Southern Bell Telephone  
and Telegraph Co.  
150 West Flagler St.  
Miami, FL 33130

Gerald B. Curington  
Dept. of Legal Affairs  
The Capitol, Room 1063  
Tallahassee, FL 32399-1050

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

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

Richard D. Melson  
Hopping Boyd Green & Sams  
P.O. Box 6526  
Tallahassee, FL 32314

Laura L. Wilson  
Florida Cable Telecommunications  
Assoc., Inc.  
310 N. Monroe St.  
Tallahassee, FL 32301

Chanthina R. Bryant  
Sprint Communications Co. Ltd.  
3100 Cumberland Circle  
Atlanta, GA 30339

Nancy B. White  
Southern Bell Telephone and  
Telegraph Co.  
4300 - 675 W. Peachtree St.  
Atlanta, GA 30375

Benjamin H. Dickins, Jr.  
Blooston, Mordkofsky, Jackson  
& Dickins  
2120 L Street, N.W.  
Washington, D.C. 20037

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs, Odom  
& Ervin  
305 S. Gadsen St.  
P.O. Drawer 1170  
Tallahassee, FL 32302

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. )

CWA'S PRE-HEARING STATEMENT

COMES NOW, the Petitioners, Locals 3121, 3122 and 3107 Communication Workers of America, AFL-CIO ("CWA"), by and through their undersigned counsel, and files this Pre-Hearing Statement and states:

(a) WITNESSES:

1. Robert Krukles, President of CWA Local 3121. CWA Proposal; Refund proposed.
2. William I. Knowles, Jr., President of CWA Local 3122. CWA Proposal; Refund proposed.
3. Tony Dorado, President of Local 3107. CWA Proposal; Refund proposed.

(b) EXHIBITS:

William I. Knowles, Jr. will sponsor all exhibits. Composite exhibits may be used.

1. Documents produced in discovery in this proceeding.
2. William I. Knowles, Jr. Direct Testimony.
3. All pleadings filed by Communication Workers of America.
4. Any other pleadings filed in Docket No. 920260-TL.

(c) STATEMENT OF POSITION IN THE PROCEEDINGS:

- \*1. CWA believes \$25 million refund should be adopted.

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(d) STATEMENT OF QUESTIONS OF FACT AT ISSUE AND PARTY'S POSITION:

1. Which of the following proposals to dispose of \$25 million for Southern Bell should be approved?
  - (1) SBT's proposal to implement the Extended Calling Service (ECS) plan pursuant to the tariff filed on May 15, 1995. (T-95-304) No.
  - (2) CWA's proposal to reduce each of the following by \$5 million:
    - (i) Basic "lifeline" senior citizens telephone service; Yes.
    - (ii) Basic residential telephone service; Yes.
    - (iii) Basic telephone service to any organization that is non-profit with 501(c) tax exempt status; Yes.
    - (iv) Basic telephone service of any public school, community college and state university; Yes.
    - (v) Basic telephone service of any qualified disabled ratepayer; Yes.
  - (3) McCaw's and FMCA's proposal that a portion be used, if necessary to implement the decisions rendered in DN 940235-TL. No.
  - (4) Any other plan deemed appropriate by the Commission. No.
2. If the Southern Bell proposal is approved, should the Commission allow competition on the Extended Service Calling Routes? If so, what additional actions, if any, should the Commission take?  
No position at this time.
3. When should tariffs be filed and what should be the effective date? No position at this time.
4. Should this docket be closed? No.

(e) QUESTIONS OF LAW:

1. Whether the PSC could adopt the CWA proposal? Yes.

(f) POLICY QUESTIONS AT ISSUE, PARTY'S POSITION AND WITNESS TO ADDRESS ISSUE:

1. None.

(g) STATEMENT OF STIPULATED ISSUES:

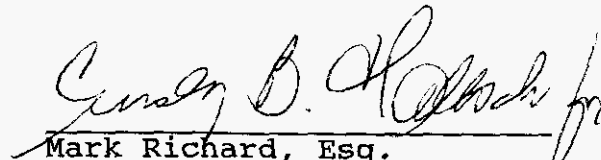
1. None.

(h) PENDING MOTIONS OR OTHER ISSUES PARTY SEEKS ACTION ON:

1. None.


(i) STATEMENT OF ORDERS PARTY CANNOT COMPLY WITH:

1. None at this time.

  
\_\_\_\_\_  
Mark Richard, Esq.  
Cindy B. Hallock, Esq.  
Attorneys for Communication  
Workers of America, Locals 3121,  
3122, 3107  
304 Palermo Avenue  
Coral Gables, FL 33134  
305-443-4124

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Pre-Hearing Statement was mailed to those individuals named on the attached distribution list on this 26<sup>th</sup> day of June, 1995.

  
\_\_\_\_\_  
Mark Richard, Esq.