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Mark Richard
Attorney At Law

July 12, 1995

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Attention: Director
Division of Records & Reporting

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

Dear Sir or Madam:

Enclosed please find an original and fifteen (15) copies of CWA's Response to Southern Bell Telephone and Telegraph's Motion to Strike Portions of Locals 3121, 3122 and 3107, Communications Workers of America, AFL-CIO Prehearing Statement. Copies of the foregoing were furnished today to the individuals listed on the enclosed Distribution List.

Thank you.

Sincerely,

Mark Richard/Bes
Mark Richard

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

12K
3
MR:bes
Enclosures
cwa/psc2.3
6
Richard Legal Plan, PA
304 Palermo Avenue, Coral Gables, Florida 33134
(305) 442-8772
(305) 443-5125

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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

Mr. Douglas S. Metcalf
Communications Consultants, Inc.
631 S. Orlando Ave.
Suite 250
P.O. Box 1148
Winter Park, FL 32790-1148

Cecil O. Simpson, Jr.
Peter Q. Nyce, Jr.
Regulatory Law Office
Office of the Judge
Advocate General
Department of the Army
901 N. Stuart St.
Arlington, VA 22203-1837

Michael Fannon
Cellular One
2735 Capital Circle, N.E.
Tallahassee, FL 32308

Stan Greer
Division of Communications
Florida Public Service Comm.
101 East Gaines St.
Tallahassee, FL 32399-0863

Ms. Angela Green
Florida Public
Telecommunications Assn., Inc.
125 S. Gadsden St.
Suite 200
Tallahassee, FL 32301

Monte Belote
Florida Consumer Action Network
4100 W. Kennedy Blvd., #128
Tampa, FL 33609

Donald L. Bell, Esq.
104 East Third Avenue
Tallahassee, FL 32303

Joseph Gillan
Joseph Gillan & Associates
P.O. Box 541038
Orlando, FL 32854-1038

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman & Metz
P.O. Box 1876
215 S. Monroe Street
Tallahassee, FL 32302-1876

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
RESPONSE TO SOUTHERN BELL TELEPHONE AND TELEGRAPH'S
MOTION TO STRIKE PORTIONS OF Locals 3121, 3122 and 3107
COMMUNICATIONS WORKERS AMERICA, AFL-CIO PREHEARING STATEMENT**

COMES NOW Locals 3121, 3122 and 3107 Communication Workers of America, AFL-CIO ("CWA"), by and through their undersigned counsel, and files this Response to Southern Bell Telephone and Telegraph's ("Southern Bell") Motion to Strike Portions of CWA's Prehearing Statement and states:

1. First, though CWA has no objection to limiting the number of witnesses it intends to call at the hearing, it is incomprehensible to CWA why Southern Bell continues to circumvent CWA's ability to be heard. CWA will only be calling Willie Knowles to testify.

2. Second, CWA has no objection to limiting the exhibits listed in its Prehearing Statement to those exhibits concerning the \$25 million refund as well as the purpose of the original settlement agreement.

3. Finally, CWA objects to striking portions of its prehearing statement regarding questions of law. The Issue Identification Workshop in this proceeding was considered optional

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and voluntary. CWA chose not to attend as the issues would be resolved at the pre-hearing conference scheduled for July 17, 1995.

4. This process is supposed to be open to all interested parties. The ongoing response to CWA's attempt to participate in this process is one of bad faith opposition and obvious disdain by those who wish to proceed with business as usual. Southern Bell's objections are simply an attempt to thwart the participation of interested parties, specifically Local 3121, 3122 and 3107.



MARK RICHARD, ESQ.
CINDY B. HALLOCK, ESQ.
Attorneys for Communications Workers
of America Locals 3121, 3122 and 3107
304 Palermo Avenue
Coral Gables, FL 33134
Telephone: 305/443-5125

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed to those individuals named on the attached distribution list on this 2th day of July, 1995.



MARK RICHARD, ESQ.