

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

FILED
NOV 30 1995

In re: Comprehensive Review of)
the Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone and Telegraph)
Company.)
_____)

Docket No. 920260-TL
Filed: November 30, 1995

**MCI TELECOMMUNICATIONS CORPORATION'S
JOINDER IN FIXCA'S MOTION FOR STAY**

MCI Telecommunications Corporation (MCI) hereby joins the Motion for Stay filed by the Florida Interexchange Carrier's Association in this docket on November 28, 1995. That motion requested that the Commission stay the implementation of Order No. PSC-95-1391-FOF-TL (the "Order"), which implements ECS calling on numerous routes effective January 1, 1996, pending FIXCA's appeal of that order to the Florida Supreme Court (the "Appeal").

MCI intends to file a notice of joinder as an appellant in the Appeal. MCI likewise moves this Commission to stay the Order pending appeal for the reasons more fully set forth in FIXCA's motion for stay. The practical effect of the Commission's ECS order will be to remonopolize calling on most routes in the Southeast LATA. That remonopolization will take place even prior to implementation of the Commission's intraLATA 1+ dialing order, which itself has been stayed by the Florida Supreme Court.

As discussed in FIXCA's motion, the Commission's order presents statutory construction issues of first impression which require adjudication by the Supreme Court and on which FIXCA and

MCI believe there is a strong likelihood of prevailing on appeal. Under these circumstances, a stay is appropriate to preserve the status quo pending the outcome of the appeal. This is particularly appropriate where customers will continue to receive the benefit of the settlement provision which requires a \$25 million rate reduction by way of a credit on their bills as expressly provided for in the Stipulation.

WHEREFORE, for the reasons stated above and in FIXCA's Motion For Stay, MCI moves that the Commission stay the effectiveness of Order No. PSC-95-1391-FOF-TL pending appeal.

RESPECTFULLY SUBMITTED this 30th day of November, 1995.

HOPPING GREEN SAMS & SMITH, P.A.

By: Richard D. Melson
Richard D. Melson
Post Office Box 6526
123 South Calhoun Street
Tallahassee, FL 32314
904/222-7500

and

MICHAEL J. HENRY
MCI TELECOMMUNICATIONS CORP.
Suite 700
780 Johnson Ferry Road
Atlanta, GA 30346
404/843-6373

Attorneys for
MCI Telecommunications Corporation

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by U.S. Mail this 30th day of November, 1995.

Robert G. Beatty
Nancy B. White
c/o Marshall Criser, III
Southern Bell Telephone Company
150 S. Monroe Street
Tallahassee, FL 32301

Tracy Hatch
Division of Legal Services
Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0862

Charles J. Beck
Office of Public Counsel
Suite 801
111 East Madison Street
Tallahassee, FL 32399-1440

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
and Ervin
P.O. Box 1170
Tallahassee, FL 32302

Joseph McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas
117 S. Gadsden Street
Tallahassee, FL 32301

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

Chanthia Bryant-Abney
Sprint
3100 Cumberland Circle
Atlanta, GA 30339

Laura L. Wilson
Florida Cable Television Assoc.
310 South Monroe Street
Tallahassee, FL 32302

Michael W. Tye
AT&T Communications
101 N. Monroe St., Ste. 700
Tallahassee, FL 32301

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

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

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

Gerald B. Curington
Assistant Attorney General
Department of Legal Affairs
Room 1603, The Capitol
Tallahassee, FL 32399-1050

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

Douglas S. Metcalf
Communications Consultants, Inc.
P.O. Box 1148
Winter Park, FL 32790-1148

Mr. Jan Masek
The Print Group, Inc.
302 North La Brea Avenue #1000
Los Angeles, CA 90036

Robin Norton
Public Service Commission
Division of Communications
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0862

Rick Wright
Division of Auditing and Financial
Analysis
Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0862

Mr. Cecil O. Simpson, Jr.
Mr. Peter Q. Nyce, Jr.
Department of the Army
901 North Stuart Street
Arlington, VA 22203-1837

Angela B. Green
Fla. Pay Telephone Ass'n.
315 South Calhoun Street
Suite 710, Barnett Bank Bldg.
Tallahassee, FL 32302

Floyd R. Self
Messer, Vickers, Caparello,
Lewis, Goldman & Metz, P.A.
P.O. Box 1876
Tallahassee, FL 32302-1876

Mark Richard
Locals 3121, 3122 and 3107
304 Palermo Avenue
Coral Gables, FL 33134

Kenneth A. Hoffman
Messer, Vickers, Caparello
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302

Stan Greer
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Michael Fannon
Cellular One
2735 Capital Circle, NE
Tallahassee, FL 32308

Susan K. Weinstock
Utility Issues Team Leader
State Legislation Department
AARP
601 E Street, NW
Washington, DC 20049



Attorney