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February 20, 1996

IN REPLY REFER TO:
Tallahassee

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

**ORIGINAL
15 COPY**

Re: Resolution of Petition to Establish Non
Discriminatory Rates, Terms, and Conditions
for Interconnection Involving Local Exchange
Companies and Alternative Local Exchange
Companies pursuant to Section 364.162,
Florida Statutes - Docket No. 950985-TP

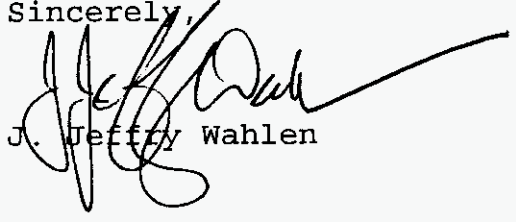
Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of United/Centel's Request for Oral Argument.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU Chese
- CTR _____
- EAG _____ JJW/csu
- LEG 1 Enclosures
- LIN 5 cc: All parties of record
- OPC _____ utd\950985.by3
- RCH _____
- SEC T
- WAS _____
- OTH _____

RECEIVED & FILED
Wahlen
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

02015 FEB 20 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition to) DOCKET NO. 950985-TP
Establish Non Discriminatory Rates,) Filed: 02/20/96
Terms, and Conditions for Inter-)
connection Involving Local Exchange))
Companies and Alternative Local)
Exchange Companies pursuant to)
Section 364.162, Florida Statutes)
_____)

UNITED TELEPHONE COMPANY OF FLORIDA AND
CENTRAL TELEPHONE COMPANY OF FLORIDA'S
REQUEST FOR ORAL ARGUMENT AT PREHEARING CONFERENCE
ON
MOTION ON ISSUES AND PARTIES

Pursuant to Commission Rule 25-22.058, Florida Administrative Code, UNITED TELEPHONE COMPANY OF FLORIDA and CENTRAL TELEPHONE COMPANY OF FLORIDA ("Sprint-United/Centel" or the "Companies") respectfully request oral argument¹ at the Prehearing Conference on their Motion on Issues and Parties, dated February 20, 1996. While the premise underlying the motion ("one bite at the apple is enough") is simple, the nature of legal standing and the meaning of Section 364.162, Florida Statutes, can be complicated. Allowing the parties to argue the Motion at the Prehearing Conference will aid the Prehearing Officer in comprehending and evaluating the potentially complex issues raised in the motion, and will promote

¹While motions of this type are routinely heard and decided at the prehearing conference, the Companies have filed this request for "oral argument" in an abundance of caution, and to put the parties on notice that they intend to raise the issues in that motion at the prehearing conference.


DOCUMENT NUMBER-DATE

02015 FEB 20 96

FPSC-RECORDS/REPORTING 1674

the prompt and efficient resolution of the issues raised therein.

DATED this 20th day of February, 1995.



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ATTORNEYS FOR UNITED TELEPHONE
COMPANY OF FLORIDA AND CENTRAL
TELEPHONE COMPANY OF FLORIDA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) or overnight express (**) this 20th day of February, 1996, to the following:

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