

10 ⁰⁰ ₂

MACFARLANE AUSLEY FERGUSON & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(904) 224-9115 FAX (904) 222-7560

111 MADISON STREET, SUITE 2300
P.O. BOX 1531 (ZIP 33601)
TAMPA, FLORIDA 33602
(813) 273-4200 FAX (813) 273-4396

400 CLEVELAND STREET
P. O. BOX 1669 (ZIP 34617)
CLEARWATER, FLORIDA 34615
(813) 441-8966 FAX (813) 442-8470

February 21, 1996

IN REPLY REFER TO:
Tallahassee

**ORIGINAL
FILE COPY**

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

Re: Resolution of Petition to Establish Non
Discriminatory Rates, Terms, and Conditions
for Resale Involving Local Exchange
Companies and Alternative Local Exchange
Companies pursuant to Section 364.161,
Florida Statutes - Docket No. 950984-TP

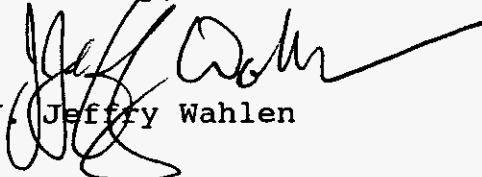
Dear Ms. Bayo:

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
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

JJW/csu
Enclosures
cc: All parties of record

uld950984.by3

RECEIVED & FILED

BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
02119 FEB 21 96
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition to) DOCKET NO. 950984-TP
Establish Non Discriminatory Rates,) Filed: 2/21/96
Terms, and Conditions for resale)
Involving Local Exchange)
Companies and Alternative Local)
Exchange Companies pursuant to)
Section 364.161, 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 21, 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 364.161, 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 the prompt and efficient resolution of the issues raised therein.

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.

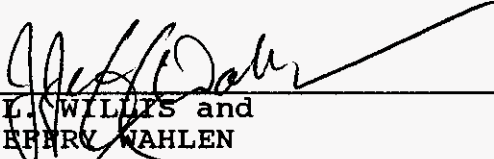
DOCUMENT NUMBER-DATE

02119 FEB 21 96

FPSC-RECORDS/REPORTING

833

DATED this 21th day of February, 1995.



LEE L. WILLIS and
J. JERRY WAHLEN
Macfarlane Ausley Ferguson
& McMullen
P. O. Box 391
Tallahassee, Florida 32302
(904) 224-9115

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 21th day of February, 1996, to the following:

Robert V. Elias *
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Blvd., Rm 370
Tallahassee, FL 32399-0850

Donald L. Crosby **
Continental Cablevision, Inc.
Southeastern Region
7800 Belfort Parkway, Suite 270
Jacksonville, FL 32256-6925

Anthony P. Gillman
Kimberly Caswell
GTE Florida Incorporated
Post Office Box 110, FLTC0007
Tampa, FL 31601-0110

Steven D. Shannon
MCI Metro Access Transmission
Svcs., Inc.
2250 Lakeside Blvd.
Richardson, TX 75082

Leslie Carter
Digital Media Partners
1 Prestige Place, Suite 255
2600 McCormack Drive
Clearwater, FL 34619-1098

James C. Falvey **
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, DC 20007

David Erwin
Young Van Assenderp et al.
Post Office Box 1833
Tallahassee, FL 32302-1833

Richard A. Gerstemeier
Time Warner AxS of FL, L.P.
2251 Lucien Way, Suite 320
Maitland, FL 32751-7023

Leo I. George
Lonestar Wireless of FL, Inc.
1146 19th Street, NW, Suite 200
Washington, DC 20036

Charles W. Murphy
Pennington Law Firm
Post Office Box 10095
Tallahassee, FL 32302

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, FL 32302

Andrew D. Lipman
Metropolitan Fiber Systems of
FL, Inc.
One Tower Lane, Suite 1600
Oakbrook Terrace, IL 60181-
4630

Richard D. Melson *
Hopping Boyd Green et al.
Post Office Box 6526
Tallahassee, FL 32314

J. Phillip Carver
c/o Nancy H. Sims
BellSouth Telecommunications
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301

John Murray
Payphone Consultants, Inc.
3431 NW 55th Street
Ft. Lauderdale, FL 33309-6308

Patricia Kurlin
Intermedia Communications of FL
9280 Bay Plaza Blvd., Suite 720
Tampa, FL 33619-4453

Gary T. Lawrence
City of Lakeland
501 East Lemon Street
Lakeland, FL 33801-5079

Jill Butler
Digital Media Partners/
Time Warner Communications
2773 Red Maple Ridge
Tallahassee, FL 32301

Graham A. Taylor
TCG South Florida
1001 W. Cypress Creek Rd.,
Suite 209
Ft. Lauderdale, FL 33309-1949

Clay Phillips
Utilities & Telecommunications
Room 410
House Office Building
Tallahassee, FL 32399

Greg Krasovsky
Commerce & Economic
Opportunities
Room 4265
Senate Office Building
Tallahassee, FL 32399

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

Nels Roseland
Executive Office of the
Governor
Office of Planning & Budget
The Capitol, Room 1502
Tallahassee, FL 32399

Paul Kouroupas
Director, Regulatory Affairs
Teleport Communications Group
Two Teleport Drive, Suite 300
Staten Island, NY 10311

Floyd R. Self
Messer, Caparello, et al.
Post Office Box 1876
Tallahassee, FL 32302

Michael W. Tye *
AT&T
101 N. Monroe Street
Suite 700
Tallahassee, FL 32301

Robin D. Dunson
1200 Peachtree Street, NE
Promenade I, Room 4038
Atlanta, GA 30309

Sue E. Weiske
Time Warner Communications
160 Inverness Drive West
Englewood, CO 80112

Laura L. Wilson *
FCTA
310 North Monroe Street
Tallahassee, FL 32301

Ken Hoffman
Rutledge, Ecenia, et. al
215 S. Monroe Street, Suite 420
Tallahassee, FL 32301-1841

Jodie Donovan-May
Eastern Region Counsel
Teleport Communications Group
1133 21st Street, NW, Suite 400
Washington, DC 20036


ATTORNEY