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June 11, 1996

HAND-DELIVERED

Blanca S. Bayo, Director  
Division of Records and Reporting  
Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

Re: Joint Complaint of Florida Interexchange Carriers Association, MCI  
Telecommunications Corporation, and AT&T Communications of the  
Southern States, Inc., against BellSouth Telecommunications, Inc.  
Docket No. ~~960658-TL~~ + 930330-TP

Dear Ms. Bayo:

ACK  Enclosed for filing and distribution are the original and sixteen copies of the  
AFM  Joint Motion to Consolidate Proceedings of Florida Interexchange Carriers Association,  
APC  MCI Telecommunications Corporation, and AT&T Communications of the Southern  
CAF  States, Inc., against BellSouth Telecommunications, Inc., in the above docket.

CMH  Please acknowledge receipt of the above on the extra copy enclosed herein and  
CST  return it to me. Thank you for your assistance.

EDJ   
LEJ   
LIR   
ODC   
RGA   
S.  JAM/jei

Yours truly,

*Joseph A. McGlothlin*  
Joseph A. McGlothlin

W. S.   
D. M.  Enclosure

RECEIVED & FILED

*[Signature]*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
06279 JUN 11 96  
FPSC-RECORDS/REPORTING

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Complaint of Florida ) DOCKET NO. 930330-TP  
Interexchange Carriers Association, )  
MCI Telecommunications Corporation, )  
and AT&T Communications of the )  
Southern States, Inc., against )  
BellSouth Telecommunications, )  
Inc. )

In re: Complaint of Florida ) DOCKET NO. 960658-TL  
Interexchange Carriers Association, )  
MCI Telecommunications Corporation, ) FILED: June 11, 1996  
and AT&T Communications of the )  
Southern States, Inc., against )  
BellSouth Telecommunications, )  
Inc. )

JOINT MOTION TO CONSOLIDATE PROCEEDINGS

The Florida Interexchange Carriers Association ("FIXCA"), MCI Telecommunications Corporation ("MCI"), and AT&T Communications of the Southern States, Inc. ("AT&T"), through their undersigned counsel, move for an order consolidating the above dockets, and state:

1. In Docket No. 960658-TL, FIXCA, MCI, and AT&T filed on May 24, 1996 a Joint Complaint against BellSouth Telecommunications, Inc. ("BellSouth"). In the Joint Complaint, FIXCA, MCI and AT&T allege that BellSouth has engaged in anticompetitive practices that violate Section 364.01(4)(g), Florida Statutes (1995) and would impede the implementation of the fair intraLATA competition based on 1+ dialing parity ordered by the Commission in Order No. PSC-95-0203-FOF-TP.

2. In the Joint Complaint, FIXCA, MCI, and AT&T enumerate specific examples of BellSouth's anticompetitive actions and practices. Among the specific items are two preferred

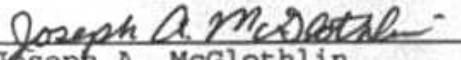
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interexchange carrier ("PIC") change charges that BellSouth developed for inclusion in its 1+ intraLATA cost recovery tariff provisions: the PIC change charge applicable to the first change requested by existing customers, and the application of two separate PIC change charges to a customer who requests a change of intraLATA and interLATA carriers at the same time.

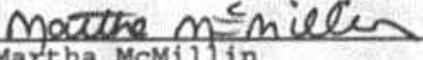
3. In Docket No. 930330-TP, BellSouth submitted the tariff revisions that are the subject of the Joint Complaint to the Commission for approval. By Order No. PSC-96-0692-FOF-TP, the Commission proposed to approve the tariff revisions, subject to the right of affected parties to protest the tariffs and file a petition seeking a formal hearing. On June 11, 1996, FIXCA, MCI, and AT&T filed such a protest and petition for a formal proceeding.

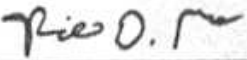
4. The tariff items challenged in Docket No. 930330-TP by the Joint Petition on Order NO. PSC-96-0692-FOF-TP are the same tariff items that are the subject of the Joint Complaint. Because the Commission's procedures establish a specific mechanism for consideration of proposed tariffs, the separate Joint Petition directed to Order No. PSC-96-0692-FOF-TP was necessary to prevent the tariffs from taking effect on a permanent basis prior to the disposition of the Joint Complaint. However, inasmuch as the same tariff is the subject of both dockets, in which the same parties will be involved in developing the same issues with the same proof, FIXCA, MCI, and AT&T submit the objectives of administrative efficiency and the conservation of time and resources would be served by consolidating the two dockets.

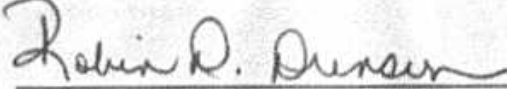
WHEREFORE, FIXCA, MCI, and AT&T request the Commission to enter an order consolidating Docket Nos. 930330-TP and 960658-TL for the purpose of considering challenges to BellSouth's 1+ intraLATA cost recovery tariff.


  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Joint Motion to Consolidate Proceedings of Florida Interexchange Carriers Association, MCI Telecommunications Corporation, and AT&T Communications of the Southern States, Inc., against BellSouth Telecommunications, Inc., has been furnished by hand delivery\* or by U.S. Mail to the following parties, this 11th day of June, 1996:

\*Nancy B. White  
c/o BellSouth  
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150 S. Monroe Street,  
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Tallahassee Fl 32301

\*Noreen Davis, Esq.  
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\_\_\_\_\_  
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