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**October 11, 1996**

**Ms. Blanco Bayo  
Director, Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850**

**Re: Docket No. 960603-TC  
Request for waiver of rules and policies which prohibit  
provisions of 0+ local and 0+ intraLATA calls from  
store-and-forward pay telephones located in confinement  
facilities by ATN, Inc.**

**Dear Ms. Bayo:**

Enclosed find the original and fifteen (15) copies of  
Indiantown Telephone System, Inc.'s Petition for Leave to  
Intervene in the above docket. Parties of record as indicated  
on the certificate of service have been served.

Sincerely,



David B. Erwin

DBE:akh  
Enclosures  
cc: Jim McGinn

DO NOT WRITE IN THESE SPACES

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FPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for waiver of )  
rules and policies which pro- )  
hibit provisions of 0+ local )  
and 0+ intraLATA calls from )  
store-and-forward pay telephones )  
located in confinement facili- )  
ties by ATN, Inc. )

Docket No. 960603-TC

Filed: October 11, 1996

**INDIANTOWN TELEPHONE SYSTEM, INC.'S  
PETITION FOR LEAVE TO INTERVENE**

Indiantown Telephone System, Inc., pursuant to Rule 25-22.039, F.A.C., hereby requests leave to intervene in these proceedings, and as grounds therefor states as follows:

1. Indiantown Telephone System, Inc. is a telephone company lawfully doing business in the State of Florida pursuant to authority granted by this Commission.

2. Indiantown Telephone System, Inc.'s principal place of business in Florida is at

15925 S. W. Warfield Boulevard  
P. O. Box 277  
Indiantown, Florida 34956

3. All pleadings and other documents in this proceeding may be served upon the undersigned attorney for Indiantown Telephone System, Inc. at the address given below.

4. Any decision made by the Commission in this proceeding will affect the substantial interests of Indiantown Telephone System, Inc. and its business operations. The petition in this docket asks for waiver of specified rules that affect the manner in which Petitioner can conduct business through its pay telephones located in confinement facilities. Today 0+ local and

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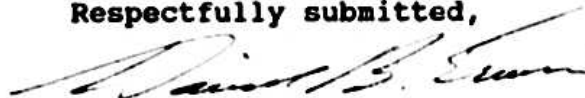
0+ intraLATA calls are reserved to the local exchange company (LEC). If Petitioner's request for waiver is granted Petitioner could completely bypass the LEC and deprive the LEC of revenue from 0+ local and 0+ intraLATA traffic.

5. Even if Petitioner does not provide pay telephone service to confinement facilities in Indiantown Telephone System, Inc.'s service territory today, Petitioner has statewide authority, and Petitioner could provide such service at any time, thereby affecting Indiantown Telephone System, Inc.'s substantial interests. If Indiantown Telephone System, Inc. does not challenge the requested waiver at this time, it may have forever lost the opportunity to do so.

6. ALLTEL Florida, Inc., has filed a timely Petition on Proposed Agency Action in this docket, thereby already raising the issues that also affect Indiantown Telephone System, Inc.

WHEREFORE, Indiantown Telephone System, Inc. requests that the Commission grant the company leave to intervene for all legal purposes in this docket.

Respectfully submitted,



David B. Erwin  
Young, van Assenderp & Varnadoe, P.A.  
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P. O. Box 1833  
Tallahassee, FL 32302

Attorneys for Indiantown Telephone  
System, Inc.  
15925 S. W. Warfield Boulevard  
P. O. Box 277  
Indiantown, Florida 34956

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 960603-TC**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail or hand delivery this 11 day of October, 1996, to the following:

Martha Brown  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Robert Spangler  
ATN, Inc.  
919 Dilworth Street  
St. Marys, Georgia 31558

Lee L. Willis  
J. Jeffry Wahlen  
Ausley & McMullen  
P. O. Box 391  
Tallahassee, FL 32302

Harriet Eudy  
ALLTEL Florida, Inc.  
P. O. Box 550  
Live Oak, FL 32060

  
\_\_\_\_\_  
David B. Erwin

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