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January 23, 1997

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

Docket No. ~~98854~~-TI

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of AT&T's Request for Rule Development Workshop.

Yours truly,

Marsha E. Rule

ACK	_____
AFA	_____
APP	1 _____
CAF	_____
CMU	_____
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EAG	_____
LEG	_____
LIN	5 _____
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SEC	1 _____
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed adoption of Rules 25-24.900,)
F.A.C., et seq., relating to prepaid calling)
services.)

Docket No. 980254-TI

Filed: 1/23/97

**AT&T's Request
for Rule Development Workshop**

Pursuant to Section 120.54(2)(c), Florida Statutes and the Notice of Proposed Rule Development issued by the Florida Public Service Commission on December 20, 1996, AT&T Communications of the Southern States, Inc. (AT&T) requests that the Commission hold a rule development workshop in the above docket. For cause, AT&T shows:

1. AT&T is a provider of prepaid debit service over its own facilities-based network and also sells network time to IXCs that provide their own prepaid debit service. AT&T therefore will be affected by any prepaid debit service rules eventually adopted by the Commission.

2. The draft rules set forth in the Commission's Notice of Proposed Rule Development impose certain requirements on prepaid debit service providers that are both over- and under-inclusive. In addition, AT&T is concerned that the draft rules may subject it to liability for actions of its resellers that are beyond its control. AT&T requests a workshop in order to explore the rationale for such rule provisions in order that it may suggest more appropriate

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FPSC-RECORDS/REPORTING

and lower cost regulatory alternatives to one or more of the proposed rules which substantially will accomplish the objectives of the law being implemented.

3. In 1996 Staff held several workshops relating to prepaid debit service, after which the Commission voted to begin rulemaking. Several important requirements in the draft rules were not discussed at the 1996 workshops, which were well-attended by industry members as well as consumer advocates. Given the very active industry participation at the 1996 workshops and agenda conference, AT&T believes that the present draft rules will be controversial. A rule development workshop is thus appropriate to allow input to new requirements included in the draft rules.

WHEREFORE, AT&T respectfully requests that this Commission hold a rule development workshop at the time and place previously noticed.



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