

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
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In re: Comprehensive Review of the) Docket No. 920260-TL
Revenue Requirements and Rate)
Stabilization Plan of Southern Bell) Filed: 2-24-97
Telephone and Telegraph Company)

PALM BEACH NEWSPAPERS, INC.'S
REQUEST FOR ORAL ARGUMENT ON MOTION FOR RECONSIDERATION

Palm Beach Newspapers, Inc. (PBNI), pursuant to Commission Rule 25-22.058, hereby files this its request for oral argument on PBNI's Motion for Reconsideration. As grounds for this request, PBNI states as follows.

1. PBNI has filed contemporaneously with this request a motion for reconsideration of Order No. PSC-97-0128-FOF-TL, which denied PBNI's proposal to change the N11 tariff of BellSouth Telephone (BST) so that the N11 customer pays a flat rate of \$0.01 per minute or the current monthly minimum, whichever is greater. Under Commission Rule 25-22.058, oral argument is appropriate where it will aid the Commission in comprehending and evaluating the issue before it. Oral argument on PBNI's motion for reconsideration will serve this purpose for at least three reasons.

2. **First**, the primary basis of the motion for reconsideration is that the Commission overlooked or failed to consider PBNI's confidential post-hearing brief ("Confidential Brief"). The Confidential Brief explains in detail why PBNI's proposal will (a) have zero revenue effect on BST, (b) lessen exorbitant rates over time, and (c) serve the public interest by promoting the development of N11 services and products. Because the Confidential Brief is long and complex, oral argument will aid

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the Commission in comprehending and evaluating the arguments therein.

3. **Second**, in this proceeding no live testimony was taken; rather, all prefiled testimony and exhibits were stipulated into the record. Consequently the Commission has not had the opportunity to question any party about its position on the various proposals. Oral argument would provide the Commissioners that opportunity with respect to PBNI's proposal, and thus would aid the Commission in comprehending and evaluating the issue before it.

4. **Third**, As a customer of N11 service, PBNI's position in this proceeding is unique. PBNI subscribes to a monopoly non-basic service which will likely never be competitive. Like IXCs who depend on end-users reaching them through feature group access, PBNI depends on end-users reaching it through abbreviated dialing access. Oral argument would thus assist the Commissioners in understanding and evaluating two key aspects of PBNI's request for relief:

why competition (either facilities based or through resale) will not deliver more rationale pricing to N11 customers; and

why PBNI and other N11 customers are and will remain captive customers dependent on the Commission for protection from exorbitant pricing.

FOR THE REASONS GIVEN ABOVE, it is clear that oral argument would aid the Commission in comprehending and evaluating the PBNI's Motion for Reconsideration of Order No. PSC-97-0128-FOF-TL. PBNI therefor urges the Commission to grant oral argument on this matter.

Respectfully submitted this 24th day of February 1997.



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CERTIFICATE OF SERVICE
Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing Palm Beach Newspapers, Inc.'s Request for Oral Argument on Motion for Reconsideration has been furnished by U.S. Mail this 24th day of February, 1997, to:

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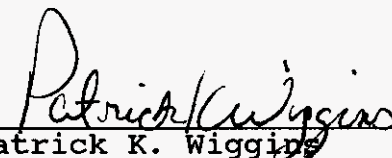
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