

Communications
Workers of America
AFL-CIO

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Kenneth S. Ruth
Florida Director

ORIGINAL
FILE COPY



August 21, 1997

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
4075 Esplanade Way
Tallahassee, FL 32399

Re: Docket No. 960786-TL -
In Re: Consideration of BellSouth, etc.

Dear Director Bayo:

I have enclosed for filing with the Florida Public Service Commission in the above referenced case a Motion to Intervene, Motion to File Late Pre-Hearing Statement, and Pre-Hearing Statement from Communications Workers of America (CWA). Also I have enclosed fifteen (15) copies of each item pursuant to your procedures.

Pursuant to Rule 25-22.028(1), F.A.C., I have enclosed for filing a diskette containing these three (3) pleadings. The diskette is high density, the operating system is Windows 95, and the Software is Word Perfect 6.1.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth S. Ruth".

Kenneth S. Ruth
Florida Director

Motion to Intervene - 08511-97
Motion to file late PHS - 08512-97
PHS of Comm. v. BellSouth - 08513-97

KSR-hjb
opeiu #2
Enclosure

cmu
log-2
LIN-5
SEC-1



FILED
AUG 22 1996

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth)
Telecommunications, Inc.'s entry)
into interLATA services pursuant)
to Section 271 of the Federal)
Telecommunications Act of 1996.)
_____)

Docket No. 960786-TL

COMMUNICATIONS WORKERS OF AMERICA'S PETITION TO INTERVENE

COMES NOW, COMMUNICATIONS WORKERS OF AMERICA ("CWA"),
pursuant to Rules 25-22.039 and 25-22.008(4), F.A.C., and
respectfully requests the presiding officer grant it leave to
intervene in this matter. As grounds:

1. CWA is a duly authorized employee organization
representing thousands of people employed by BellSouth and other
telecommunications companies throughout Florida and the United
States.

2. CWA is party to collective bargaining agreements
covering employees' wages, hours, and terms and conditions of
employment with BellSouth and other telecommunications companies
doing business in Florida and the United States.

3. The substantial interests of CWA and the employees it
represents are subject to determination or will be affected
through this preceding.

a. CWA's collective bargaining agreements with
BellSouth and other telecommunications companies, and the wages,
hours, and terms and conditions of employment for the employees
CWA represents will be affected by this proceeding, regardless of
the outcome. Change or lack of change to the telecommunications
industry in Florida will affect the livelihoods of CWA members.

DOCUMENT NUMBER-DATE

08511 AUG 22 96

FPSC-RECORDS/REPORTING

b) CWA is concerned with BellSouth's compliance with the fourteen (14) point Competitive Checklist as found in Section 271(c)(2)(B) of the Telecommunications Act of 1996 [47 U.S.C.A. Section 271(c)(2)(B)].

c) CWA is concerned that the failure of BellSouth to comply fully would adversely affect the employees CWA represents at BellSouth and other telecommunications companies with wage rates, employment rates, hours of work, and other terms and conditions of employment. Service to the public by CWA represented employees likewise will be affected.

d) CWA is concerned that the revenue derived from this long distance service will not adequately cover the costs of providing the service with the adverse potential that the work forces CWA represents would be reduced substantially and the quality of service to the public would be substantially diminished.

e) This case will have a direct effect on collective bargaining issues and topics in CWA's contract negotiations over wages, hours, and terms and conditions of employment with BellSouth and other telecommunications companies.

4. CWA understands it takes the case as CWA finds it.

5. The undersigned is the duly authorized highest ranking officer representing CWA in this State. He is CWA's Florida Director.


6. Along with this motion, CWA is submitting a petition To File Late Prehearing Statement and a Prehearing Statement in compliance with the prior scheduling orders and Rule 25-

22.038()3), F.A.C. outlining its position on the issues.

7. CWA's intervention will not affect the hearing dates, schedule or other procedures established in this case.

WHEREFORE, CWA respectfully requests this petition be granted and that it be allowed to intervene in this case.

Respectfully submitted,

A handwritten signature in cursive script, reading "Kenneth S. Ruth". The signature is written in black ink and is positioned above a horizontal line.

KENNETH S. RUTH, Florida Director
COMMUNICATIONS WORKERS OF AMERICA
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the Communications Workers of America's Petition To Intervene was furnished by U. S. Mail to the following this 21st day of August, 1997:

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Kenneth S. Ruth