



ORIGINAL

October 9, 1997

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

Re: Docket No. 991560-TP.

Dear Ms. Bayó:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of the Florida Public Telecommunications Association, Inc.'s Request for Rule Development Workshop.

An extra copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.

Thank you for your assistance with this filing.

Sincerely,

Angela B. Green
General Counsel

- ACK
- AFA
- APP Caldwell
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

Enclosures

cc: Ms. Diana Caldwell

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BUREAU OF RECORDS

DOCUMENT NUMBER - DATE

10412-OCT 10 5

FPSC - RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed repeal of Rule) Docket No. 951560-TP
25-4.076, F.A.C., Pay Telephone)
Service Provided by Local Exchange) Dated: October 9, 1997
Companies, and proposed amendments)
to Rules 25-4.003, F.A.C.,)
Definitions; 25-4.0345, F.A.C.,)
Customer Premises Equipment and)
Inside Wire; 25-24.475, F.A.C.,)
Company Operations; Rules)
Incorporated; 25-24.505, F.A.C.,)
Scope; 25-24.511, F.A.C.,)
Application for Certificate;)
25-24.515, F.A.C., Pay Telephone)
Service; 25-24.516, F.A.C., Non-)
Local Exchange Pay Telephone Rate)
Caps; and 25-24.520, F.A.C.,)
Reporting Requirement)

REQUEST FOR RULE DEVELOPMENT WORKSHOP

Pursuant to Section 120.54, Florida Statutes, and Notice issued September 18, 1997, the Florida Public Telecommunications Association, Inc. ("FPTA") respectfully requests that the Florida Public Service Commission ("Commission") hold a rule development workshop in the above-captioned docket. In support thereof, FPTA states as follows:

1. The complete name and address of the party requesting the workshop is:

Florida Public Telecommunications Association, Inc.
Lance C. Norris, President
125 South Gadsden Street
Suite 200
Tallahassee, Florida 32301

2. All notices, pleadings, orders, and other documents should be directed to:

DOCUMENT NUMBER-DATE

10412 OCT 106

FPSC-RECORDS/REPORTING

Angela B. Green
Florida Public Telecommunications Association, Inc.
125 South Gadsden Street
Suite 200
Tallahassee, Florida 32301

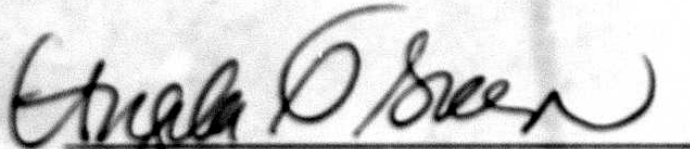
3. FPTA is a domestic, not-for-profit corporation organized pursuant to Chapter 617, Florida Statutes. The membership of the FPTA includes payphone service providers ("PSPs") certificated by the Commission. FPTA's members, as PSPs, have a substantial interest in the subject matter of the rules being addressed through this docket because these rules directly affect the terms and conditions under which FPTA's members conduct business in the State of Florida.

4. FPTA is requesting a rule development workshop in this docket because FPTA believes that several of the proposed rules are in direct conflict with the Federal Communications Commission's ("FCC's") Orders implementing the pay telephone provisions of the Telecommunications Act of 1996. For example, proposed Rule 25-24.515(9)(b), F.A.C., would require pay telephone providers to allow a minimum elapsed time of 15 minutes on local coin calls placed from their phones. FPTA believes that the FCC's preemption of local coin calling rates prohibits such action by the Commission. In addition, there are several areas within the proposed rules which represent a substantial departure from existing Commission policy, which the FPTA would like to have an opportunity to discuss with Staff and interested parties. For example, proposed Rule 25-24.515(13)(a), F.A.C., would impose

a one (1) year time limit on approved requests for incoming call blocking. Holding a rule development workshop would facilitate discussions between Staff and affected parties and allow for the development of rules that are reasonable and practical and take into consideration legitimate concerns raised by the parties who are affected by the rules.

BASED ON THE FOREGOING, FPTA requests that the Commission hold a rule development workshop in this docket.

Respectfully submitted this 9th day of October, 1997.



ANGELA B. GREEN
GENERAL COUNSEL

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Association, Inc.
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