

ORIGINAL

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March 16, 1998

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

In re: Petition of BellSouth Telecommunications, Inc. to Remove InterLATA Access
Subsidy of St. Joseph Telephone and Telegraph Company
Docket No. 970808-TL

Dear Ms. Bayo:

Enclosed please find an original and 15 copies of Motion to Allow Oral Argument on
behalf of GTC, Inc. Copies have been provided to parties of record.

Sincerely,



David B. Erwin

ACK _____
AFA 2
APP _____
CAF _____
CMU 1
CTR _____
EAG _____
LRS 1
LUN 5
OPC _____
RCH _____
SEC 1
WAS _____
DTH _____

DBE:akh
Enclosures
cc: Parties of Record
John H. Vaughan, Vice President, GTC, Inc.

DOCUMENT NUMBER-DATE
03235 MAR 16 88
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Petition of BellSouth)
Telecommunications, Inc. to)
Remove InterLATA Access)
Subsidy Received by St. Joseph)
Telephone & Telegraph Company)
_____)

Docket No. 970808-TL

Filed: March 16, 1998

**MOTION TO ALLOW
ORAL ARGUMENT**

GTC, Inc. (Formerly known as St. Joseph Telephone & Telegraph Company) moves to allow oral argument on its Petition for Reconsideration of Order No. PSC-98-0300-PCO-TL and in support states as follows:

1. The legal issues raised by GTC, Inc. in this matter have never been addressed by the Commission before, and oral argument would help the Commission understand the issues.
2. The issues in this case call for an interpretation of the law. GTC, Inc. has alleged that the Prehearing Officer has misinterpreted the law, and argument addressed to the pertinent statutory sections would help the Commission understand this aspect of the telecommunications regulatory scheme adopted by the Legislature in the 1995 Telecommunications Act.
3. This matter has not been to hearing and is at a stage where oral argument is ordinarily permitted at the Commission's Agenda Conferences.

Respectfully submitted,



David B. Erwin
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DOCUMENT NUMBER-DATE

03235 MAR 16 98

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FPSC-NICORS/REPORTING

Attorneys for
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502 Fifth Street
Port St. Joe, Florida 32456


**CERTIFICATE OF SERVICE
DOCKET NO. 970808-TL**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U.S. Mail or by hand delivery this 16th day of March, 1998 to the following:

**Beth Keating
Florida Public Service Commission
2540 Shumard Oak Blvd.
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BellSouth Telecommunications
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David B. Erwin

tlh\gtc\oral argument motion