



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE : October 14, 1998
 TO : Blanca Bayo, Director, Division of Records and Reporting
 FROM : Louis J. Yambor, Division of Communications
 RE : ~~XXXXXXXXXXXXXXXXXXXX~~ 980603-TC; Amendments to Petitions

Enclosed are the amendments to the petitions, dated August 25, 1998, for Telequip Labs, Inc. For these dockets, please find the two originals and two copies.

Thank you.

- ACK _____
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Copy to: Legal (Cox)

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Anchor

August 25, 1998
Via Overnight

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Florida Public Service Commission
Division of Communications
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: **Docket No. 980603-TC; Amendment to the Petition by Telequip Labs, Inc. for exemption from rules and orders which prohibit concentration of line services for calls made from store-and-forward pay telephones located in confinement institutions**

Dear Sir/Madam:

Enclosed for filing are the original and fifteen (15) copies of an amendment to the petition previously filed by Telequip Labs, Inc. ("Telequip") in the above referenced proceeding. In this amendment Telequip provides information required by Florida Statute 120.542 and requests an extension of the ninety (90) day processing requirement.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-8575

Yours truly,

Hal Stringer
Consultant to
Telequip Labs, Inc.

cc: Suzanne Rettew - Telequip
file: Telequip - FL
trms: FLN9802A

RECEIVED

AUG 25 1998

CMU

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for exemption from rules)
and orders which prohibit concentration of)
line services for calls made from)
store-and-forward pay telephones located)
in confinement institutions by)
Telequip Labs, Inc.)
_____)

Docket No.980603-TC

PETITION FOR WAIVER

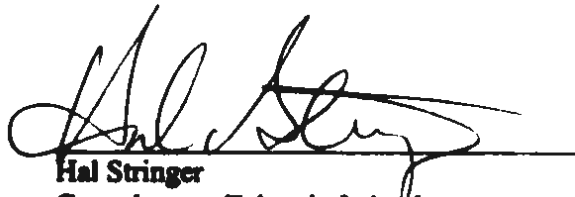
Pursuant to Commission Rule 25-24.505(3), Florida Administrative Code, Telequip Labs, Inc. ("Telequip") filed a petition on April 29, 1998 with the Florida Public Service Commission ("Commission") requesting a waiver of those rules and requirements prohibiting Telequip from utilizing line concentration when providing service from store-and-forward pay telephones located in confinement institutions within the state of Florida. Telequip files this amendment to supplement its petition with information required by Florida Statute 120.542 and to request an extension of the ninety (90) day time period for processing of the instant petition.

Telequip believes that it will suffer a substantial hardship if the line concentration prohibition is not waived. Absent a waiver, Telequip will be forced to purchase more pay telephone access lines and associated equipment than is necessary to provide inmate calling for a particular facility. Telequip believes that this unnecessary expenditure would result in lower profit margins, and possibly losses, for Telequip, and will unnecessarily increase Telequip's cost of providing service to inmate facilities.

Telequip further believes that not granting the requested waivers would violate principles of fairness as numerous competitors to Telequip have been granted such waivers in the past by the Commission. Granting Telequip the requested waiver would insure that Telequip is on an equal footing with its competitors when proposing service to inmate facilities.

WHEREFORE, Telequip Labs, Inc. respectfully requests, subject to approval of its application for certification, that it be granted exemption from the provisions of Rule 25-24.515(9), Florida Administrative Code and Order No. 14529 issued July 1, 1985 relating to line concentration, an extension of the ninety (90) day approval period prescribed by Florida Statute 120.542(2) for processing of this waiver request, and for such other relief as may be appropriate.

Respectfully submitted this 25th day of August, 1998.



Hal Stringer
Consultant to Telequip Labs, Inc.
210 North Park Avenue
Winter Park, FL 32789