

ORIGINAL



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 : Docket No. 980602-TC & [REDACTED] 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 _____
- AFA _____
- APP _____ Copy to: Legal (Cox)
- CAF _____
- CMU _____
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- SEC 1
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- OTH _____

DOCUMENT NO. 980602-DATE

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RECORDS SECTION



August 25, 1998
Via Overnight

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Winter Park, FL
32789

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Winter Park, FL
32790-0200

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tmi@tminc.com

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

Re: **Docket No. 980602-TC; Amendment to the Petition for Waiver of Rules and Requirements Prohibiting Provision of 0+ Local and IntraLATA Calls From Store and Forward Pay Telephones Located in Confinement Institutions by Telequip Labs**

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
tms: FLN9801A

RECEIVED

AUG 26 1998

CMJ

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for waiver of rules and)
requirements prohibiting provision of)
0+ local and 0+ intraLATA calls from)
store-and-forward pay telephones located)
in confinement institutions by)
Telequip Labs, Inc.)
_____)

Docket No. 980602-TC

AMENDMENT TO 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 providing 0+ local and 0+ intraLATA calls using 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 due to a significant loss of fraud control if the Company is forced to route 0+ local and 0+ intraLATA calls to the LEC. Telequip believes that its store-and-forward technology is well suited to the provision of inmate service because it provides a number of controls and restrictions that serve to reduce or eliminate fraudulent use of pay telephone services. In addition, the Company's service eliminates the opportunity for an inmate to harass a live operator.

Telequip further believes that it will suffer a substantial hardship and be forced to forgo substantial amounts of revenue if it is forced to route 0+ local and 0+ intraLATA calls to the LEC.

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 a waiver of the applicable rules, orders and policies currently prohibiting it from providing and billing for 0+ local and 0+ intraLATA calls made from store-and-forward pay telephones located in confinement institutions, 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.

A handwritten signature in black ink, appearing to read 'Hal Stringer', written over a horizontal line.

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