

ORIGINAL

RECEIVED-FPSC

99 DEC 13 PM 4:40

RECORDS AND REPORTING



JACK SHREVE
PUBLIC COUNSEL

STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison St.
Room 812
Tallahassee, Florida 32399-1400
850-488-9330

December 13, 1999

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

Re: Docket No. 981444-TL

Dear Ms. Bayo:

Enclosed for filing in the above-references docket are the original and 15 copies of Citizens' Petition to Inspect and Examine Material Claimed to be Confidential.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck
Deputy Public Counsel

CJB:bsr

- AFA _____
 - APP _____
 - CAF _____
 - CMU these
 - CTR _____
 - EAG _____
 - LEG I
 - MAS _____
 - OPC _____
 - RRR _____
 - SEC +
 - WAW _____
 - OTH _____
- Enclosures

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

~~15221~~ DEC 13 99

FPSC-RECORDS REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Number Utilization Study:)
Investigation into Number)
Conservation Measures)

Docket no. 981444-TL
Filed December 13, 1999

**PETITION TO INSPECT AND EXAMINE
MATERIAL CLAIMED TO BE CONFIDENTIAL**

Pursuant to Rules 25-22.06 and 28-106.201, Florida Administrative Code, the Citizens of Florida (Citizens), by and through Jack Shreve, Public Counsel, file this petition to inspect and examine material filed in this proceeding.

1. Section 350.0611, Florida Statutes (1999) provides that it shall be the duty of the Public Counsel to provide legal representation for the people of the state in proceedings before the Commission. It specifically provides the Public Counsel the power to appear, in the name of the state or its citizens, in any proceeding or action before the Commission and urge therein any position which he or she deems to be in the public interest.

2. Rule 15-22.006, Florida Administrative Code, allows any person to file a petition to inspect and examine material claimed to be confidential. The Citizens request the opportunity to inspect and examine the following twenty documents filed in this proceeding:

<u>Document Number</u>	<u>Date Filed</u>	<u>Company</u>
04488-99	4/7/99	Sprint
04501-99	4/7/99	MCI
04870-99	4/16/99	Omnipoint
04897-99	4/19/99	AT&T
05796-99	5/6/99	OmniPoint
12546-99	10/15/99	MCI WorldCom
12653-99	10/15/99	Aerial
12655-99	10/15/99	Omnipoint
12661-99	10/15/99	BMI
13008-99	10/22/99	Global Naps
13163-99	10/26/99	BellSouth
13351-99	11/1/99	Nextel
13524-99	11/3/99	OmniPoint
13526-99	11/3/99	Aerial
13644-99	11/5/99	BMI
13672-99	11/8/99	ITC Deltacom
13674-99	11/8/99	GTE Wireless
13676-99	11/8/99	BellSouth
13945-99	11/12/99	AT&T
14067-99	11/16/99	BellSouth

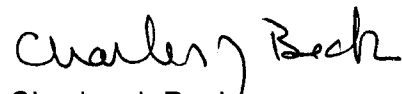
3. Without conceding that these documents actually contain any confidential or proprietary information, the Citizens do not object to issuance of a temporary

protective order by the Commission protecting the companies' claims of confidentiality while the Citizens make an initial inspection and examination of the documents.

WHEREFORE, the Citizens request to inspect and examine the twenty documents listed in this petition.

Respectfully submitted,

JACK SHREVE
Public Counsel
Fla. Bar No. 73622


Charles J. Beck
Deputy Public Counsel
Fla. Bar No. 217281

Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

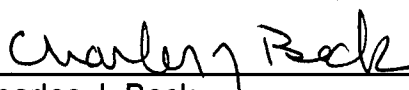
(850) 488-9330

Attorneys for Florida's Citizens

**DOCKET NO. 981444-TL
CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail or hand-delivery to the following parties on this 13th day of December, 1999.



Charles J. Beck

Diana Caldwell
Division of Legal Services
Fla. Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Kimberly Caswell
GTE Florida Incorporated
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe
Suite 400
Tallahassee, FL 32301

Michael Gross
Florida Cable Telecommunications
Association, Inc.
310 N. Monroe St.
Tallahassee, FL 32301

Donna McNulty
MCI WorldCom
325 John Knox Road
The Atrium, Suite 105
Tallahassee, FL 32303

Marsha E. Rule
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street, Suite 700
Tallahassee, FL 32301

Lee Willis, Esq.
Jeffrey Wahlen, Esq.
Ausley Law Firm
P.O. Box 391
Tallahassee, FL 32302

Everett Boyd
Ervin Law Firm
P.O. Drawer 1170
Tallahassee, FL 32302

Angela Green
Florida Public Telecommunications Assoc.
125 S. Gadsden St., #200
Tallahassee, FL 32301-1525

Bruce May
Holland Law Firm
P.O. Box 810
Tallahassee, fl 32302

Peter Dunbar
Barbara Auger
Pennington Law Firm
P.O. Box 10095
Tallahassee, FL 32302

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs & Ervin
Post Office Drawer 1170
Tallahassee, FL 32302

Bryant Law Firm
201 S. Monroe St.,
#500
Tallahassee, FL 32301

Ms. Barbara Shever
Intermedia Communications of FL, Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309

Kenneth Hoffman, Esq.
John Ellis, Esq.
Rutledge Law Firm
P.O. Box 551
Tallahassee, FL 32302

Norman Horton
Messer, Caparello & Self
P.O. Box 1876
Tallahassee, FL 32302

Peggy Arvanitas
c/o RE/MAX First Class, Inc.
620 Bypass Drive
Clearwater, FL 33764

Florida competitive Carriers Assoc.

Andrew Isar
Telecommunications Resellers Assoc.
3220 Uddenberg Lane
Suite 4
Gig Harbor, WA 98335

Brian J. Musselwhite
Regulatory Affairs Manager
ITC^DeltaCom Communications, Inc.
700 Boulevard South, Suite 101
Huntsville, AL 35802

Marcus Williams, Esq.
Foley & Lardner Law Firm
3000 K St., NW, #500
Washington, DC 20007

Floyd Self
Messer Law Firm
P.O. Box 1876
Tallahassee, FL 32302

Carolyn Marek
Vice President, Regulatory Affairs
Time Warner Communications
Southeast Region
233 Bramerton Court
Franklin, TN 37069

Richard D. Melson
Hopping Law Firm
P.O. Box 6526
Tallahassee, FL 32314

David B. Erwin, Esq.
127 Riversink Road
Crawfordville, FL 32327

Dominic Altomare

c/o J.P. Gillan and Associates
P.O. Box 541038
Orlando, FL 32874-1038

Thomas Foley
Lockheed Martin IMS
8200 Riverbend Blvd.
Longwood, FL 32779-2327

Richard M. Rindler
James C. Falvey
3000 K St., NW, #300
Washington, DC 20007

Foley & Lardner Law Firm
P.O. Box 240
Jacksonville, FL 32202-3527

Kimberly D. Wheeler
Morrison & Foerster Law Firm
2000 Pennsylvania Ave., NW
Suite 5500
Washington, DC 20006

BellSouth Mobility, Inc.
1100 Peachtree St., NE, #910
Atlanta, GA 30309-4599

981444.cos