

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

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July 30, 2001

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

Re: Docket No. 991376-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Citizens' Motion to Schedule a New Date to Hear Surrebuttal Testimony of R. Earl Poucher.

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

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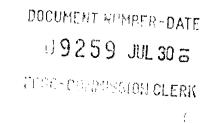
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of Show Cause)	Docket no. 991376-TL
Proceedings against GTE Florida,)	
Inc., for Violation of Service Standards)	Filed July 30, 2001

MOTION TO SCHEDULE A NEW DATE TO HEAR SURREBUTTAL TESTIMONY OF R. EARL POUCHER

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, request the Prehearing to schedule a new date to hear the surrebuttal testimony of R. Earl Poucher in this case.

- 1. The Commission is currently scheduled to hear the surrebuttal testimony of R. Earl Poucher on Wednesday, August 1, 2001.
- 2. This past Friday afternoon, Mr. Poucher's spouse scheduled an urgent appointment for surgery on Wednesday, August 1, 2001.
- 3. Citizens informed Verizon about this development and offered to (1) stipulate all testimony (both Verizon's and Citizens') into the record on Wednesday without cross examination, (2) take Verizon's testimony live on Wednesday and stipulate Mr. Poucher's testimony into the record without cross examination, or (3) take Verizon's testimony on Wednesday and schedule Mr. Poucher's surrebuttal testimony for another date.
- 4. Citizens are unsure of Verizon's position on these three possibilities, but we believe that Verizon does not object to rescheduling Mr. Poucher's testimony.



WHEREFORE, Citizens request the Commission to reschedule the surrebuttal testimony of R. Earl Poucher.

Respectfully submitted,

JACK SHREVE PUBLIC COUNSEL

Charles J. Beck

Deputy Public Counsel Fla. Bar. No. 217281

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

(850) 488-9330

Attorneys for the Citizens of Florida

DOCKET NO. 991376-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 30th day of July, 2001.

Charles J. Beck

Kimberly Caswell Verizon Florida Incorporated P.O. Box 110, FLTC0007 Tampa, FL 33601-0110 Lee Fordham Division of Legal Services FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Rick Moses Communications Division Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399