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Sent: Tuesday, October 04, 2005 2:44 PM
To: Filings@psc.state.fl.us
Cc: Charles Beck
Subject: e-filing
Attachments: 050693.Alltel Rate Rebalancing Motion re Discovery.e-filed version.doc

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Electronic Filing

a. Person responsible for this electronic filing:

Charles J. Beck, Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
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b. Docket No. 050693-TL

In re: Alltel Florida, Inc.'s Petition To Reduce Intrastate Switched Network Access Rates In A Revenue Neutral Manner Pursuant to Section 364.164, Florida Statutes.

c. Document being filed on behalf of Office of Public Counsel

d. There are a total of 3 pages.

e. The document attached for electronic filing is Citizens' Motion to Adopt Discovery Procedures From Order PSC-03-0994-PCO-TL

(See attached file: 050693.Alltel Rate Rebalancing Motion re Discovery.e-filed version.doc)

Thank you for your attention and cooperation to this request.

Brenda S. Roberts
Secretary to Charles J. Beck, Deputy Public Counsel.
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DOCUMENT NUMBER-DATE

09438 OCT-4 05

FPSC-COMMISSION CLERK

10/4/2005

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Alltel Florida, Inc.'s Petition)	
To Reduce Intrastate Switched Network)	
Access Rates In A Revenue Neutral)	Docket No. 050693-TL
Manner Pursuant to Section 364.164,)	Filed: October 4, 2005
Florida Statutes)	
_____)	

**CITIZENS' MOTION TO ADOPT DISCOVERY PROCEDURES
FROM ORDER PSC-03-0994-PCO-TL**

The Citizens of Florida, through Harold McLean, Public Counsel, file this motion to adopt discovery procedures from order PSC-03-0994-PCO-TL, and in support of this motion state the following:

1. Order no. PSC-03-0994-PCO-TL issued September 4, 2003, established procedural guidelines for the rate rebalancing petitions filed by BellSouth telecommunications, Inc., Verizon Florida, Inc., and Sprint-Florida, Incorporated, in 2003.

2. The Procedural Order in that case adopted the following guidelines, among others:

- a. All discovery requests shall be served by e-mail or fax, as well as by overnight mail;
- b. Discovery responses shall be served within 15 calendar days of receipt of the discovery request by either e-mail or fax, as well as by overnight delivery;
- c. No extra time shall be allowed for mailing;
- d. All discovery requests and responses shall be served on staff;

e. Any objection to or requests for clarification of discovery requests shall be made within five business days of service of the discovery request.

3. Given the 90 day statutory time frame for processing this case, as well as the precedent of establishing these guidelines for the rate rebalancing cases of BellSouth, Verizon and Sprint, it would be appropriate to adopt those same guidelines in this case.

4. Counsel for Alltel Florida does not object to the Prehearing Officer granting this motion.

WHEREFORE, Citizens respectfully request the Prehearing Officer to adopt the discovery procedures from order PSC-03-0994-PCO-TL in this case.

Respectfully submitted,

HAROLD MCLEAN
PUBLIC COUNSEL

s/ Charles J. Beck
Charles J. Beck
Deputy Public Counsel
Florida Bar No. 217281

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Attorney for Florida's Citizens

DOCKET NO. 050693-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 4th day of October, 2005.

s. Charles J. Beck

Charles J. Beck

Beth Keating
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