

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Joint Application for approval of transfer of control of Sprint-Florida Incorporated, holder of ILEC Certificate No. 22, and Sprint Payphone Services, Inc., holder of PATS Certificate of No. 3822, from Sprint Nextel Corporation to LTD Holding Company, and for acknowledgment of transfer of control of Sprint Long Distance, Inc., holder of IXC Registration No. TK001, from Sprint Nextel Corporation to LTD Holding Company.

DOCKET NO.: 050551-TP

REQUEST FOR ORAL ARGUMENT

COMMUNICATION WORKERS OF AMERICA ("CWA"), by and through its undersigned attorneys and pursuant to Rule 25-22.058, Florida Administrative Code, requests that the Commission allow oral argument on the Motion to Dismiss which was filed by Sprint-Florida Incorporated in this Docket.

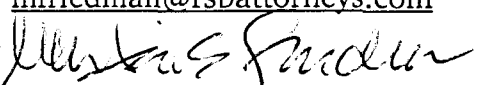
CWA believes that oral argument will assist the Commission since Sprint-Florida Incorporated has misconstrued CWA's Petition. Further, the undersigned believes this is a case of first impression in that Sprint-Florida Incorporated is arguing that its customers do not have standing to contest the financial viability of the stand-alone utility, and the concern of its customers that the quality of service will decline because of the lack of financial strength after the spin-off.

Respectfully submitted on this 8 day of November, 2005.

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DOCUMENT NUMBER - DATE

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Martin S. Friedman

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
DOCKET NO. 050551-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished
by U.S. Mail to the following parties on this 8 day of November, 2005:

Jason Rojas, Esquire
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Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

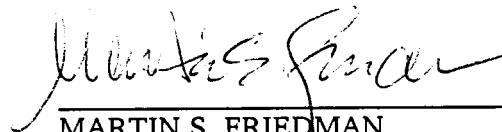
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