

STATE OF FLORIDA

OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400 904-488-9330

November 19, 1993

Steve Tribble, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, FL 32399-0850

Re: Docket No. 900960-TL 920260-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket on behalf of the Citizens of the State of Florida are the original and 1 copy of the Citizens' Additional Response to Southern Bell Telephone and Telegraph Company's 1st Set of Interrogatories and 1st Set of Requests for Production of Documents.

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

Sincerely,

Charles 1 Bech

Charles J. Beck Deputy Public Counsel

ACK \_\_\_\_\_\_AFA \_\_\_\_\_APP \_\_\_\_\_CAF \_\_\_\_\_CAF \_\_\_\_\_CAF \_\_\_\_\_CCTR \_\_\_\_\_EAG \_\_\_\_\_EAG \_\_\_\_\_EAG \_\_\_\_\_EAG \_\_\_\_\_EAG \_\_\_\_\_EAG \_\_\_\_\_EAG \_\_\_\_\_EAG \_\_\_\_\_ECE VED & FILED

AUREAU OF RECORDS

12438-93

JACK SHREVE PUBLIC COUNSEL



## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Show Cause proceeding against ) Southern Bell Telephone and Telegraph ) Company for misbilling customers ) Docket No. 900960-TL Filed: November 19, 1993

## NOTICE OF SERVICE

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, serve this notice that the Citizens have served their additional response to Southern Bell Telephone and Telegraph Company's first set of interrogatories and first set of requests for production of documents to Southern Bell Telephone and Telegraph Company ("Southern Bell") on Friday, November 19, 1993.

Respectfully submitted,

Charles Beck

Charles J. Beck Deputy Public Counsel

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

(904) 488-9330

Attorney for the Citizens of the State of Florida

DOCUMENT NUMBER-DATE

12438 NOV 198

FESC-RECORDS/REPORTING

## CERTIFICATE OF SERVICE DOCKET NO. 920260-TL

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 19th day of November, 1993.

Marshall Criser, III
BellSouth Telecommunications,
Inc. (Southern Bell Telephone
& Telegraph Company)
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Harris R. Anthony
BellSouth Telecommunications,
Inc. (Southern Bell Telephone
& Telegraph Company)
150 W. Flagler St., Suite 1910
Miami, FL 33130

Robin Norton Division of Communications Fla. Public Service Commission 101 East Gaines Street Tallahassee, FL 32301

Doug Lackey BellSouth Telecommunications, Inc. (Southern Bell Telephone & Telegraph Company) 4300 Southern Bell Center Atlanta, GA 30375

Michael A. Gross Department of Legal Affairs Attorney General The Capitol Bldg., PL-01 Tallahassee, FL 32399-1050

Laura L. Wilson c/o Florida Cable Television Association, Inc. P.O. Box 10383 310 N. Monroe Street Tallahassee, FL 32302 Angela Green Tracy Hatch Jean Wilson Division of Legal Services Fla. Public Service Commission 101 East Gaines Street Tallahassee, FL 32301

Edward Paschall Florida AARP Capital City Task Force 1923 Atapha Nene Tallahassee, FL 32301

The American Association of Retired Persons c/o Donald L. Bell 104 E. Third Avenue Tallahassee, FL 32303

Richard D. Melson Hopping, Boyd, Green & Sams 23 South Calhoun Street P.O. Box 6526 Tallahassee, FL 32314

Michael J. Henry MCI Telecommunications Corp. 780 Johnson Ferry Road Suite 700 Atlanta, GA 30342

Lance C. Norris, President Florida Pay Telephone Assn., Inc. 315 S. Calhoun Street Barnett Bank Bldg., Suite 710 Tallahassee, FL 32302 Joseph A. McGolthlin Vicki Gordon Kaufman McWhirter, Grandoff & Reeves 315 S. Calhoun Street, Suite 716 Tallahassee, FL 32301

Rick Wright AFAD Fla. Public Service Commission 101 East Gaines Street Tallahassee, FL 32301

Dan B. Hendrickson P.O. Box 1201 Tallahassee, FL 32302

Monte Belote Florida Consumer Action Network 4100 W. Kennedy Blvd., #128 Tampa, FL 33609

Cecil O. Simpson, Jr. Peter Q. Nyce, Jr. Regulatory Law Office Office of the Judge Advocate General Department of the Army 901 North Stuart St. Arlington, VA 22203-1837

Michael Fannon Cellular One 2735 Capital Circle, NE Tallahassee, FL 32308

C. Everett Boyd, Jr. Ervin, Varn, Jacobs, Odom & Ervin 305 S. Gadsden Street P.O. Drawer 1170 Tallahassee, FL 32302 Chanthina R. Bryant Sprint 3065 Cumberland Circle Atlanta, GA 30339 Michael W. Tye AT&T Communications of the Southern States, Inc. 106 East College Avenue Suite 1410 Tallahassee, FL 32301 Florida Hotel and Motel Assn. c/o Thomas F. Woods Gatlin, Woods, Carlson & Cowdery 1709-D Mahan Drive Tallahassee, FL 32308 Douglas S. Metcalf Communications Consultants, Inc. P.O. Box 1148 Winter Park, FL 32790-1148 Benjamin H. Dickens, Jr. Blooston, Mordkofsky, Jackson & Dickens 2120 L Street., N.W. Washington, DC 20037 Floyd R. Self Messer, Vickers, Caparello, Lewis, Goldman & Metz, P.A. P.O. Box 1876 Tallahassee, FL 32302-1876

Charles Beck

Charles J. Beck Deputy Public Counsel