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Alan N. Berg  
Senior Attorney

January 23, 1995

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

Re: Docket No. ~~921074-TP~~, 930955-TL, 940014-TL,  
940020-TL, 931196-TL and 940190-TL

Dear Ms. Bayo:

ACK  Enclosed for filing in the above-referenced matter please find the original  
AFA  and fifteen copies of United Telephone Company of Florida and Central  
APP  Telephone Company of Florida's Motion for Reconsideration or in the  
CAF  alternative Motion for Extension of Time A copy of same has been furnished  
CMI  *Reith* to the parties of record as shown on the attached Certificate of Service.

CTR   
EAG   
LEG  *Conzano*  
LIN  *4*  
OPC   
RCH   
SEC  Enclosure  
WIS   
OTH

Sincerely,

Alan N. Berg

DOCUMENT NUMBER-DATE

00909 JAN 25 95

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Expanded Interconnection )  
Phase II and Local Transport )  
Restructure. )

Docket No. 921074-TP  
Docket No. 930955-TL  
Docket No. 940014-TL  
Docket No. 940020-TL  
Docket No. 931196-TL  
Docket No. 940190-TL

Filed: January 24, 1995

**MOTION FOR RECONSIDERATION OR  
IN THE ALTERNATIVE MOTION FOR EXTENSION OF TIME  
OF UNITED TELEPHONE COMPANY OF FLORIDA AND  
CENTRAL TELEPHONE COMPANY OF FLORIDA**

United Telephone Company of Florida and Central Telephone Company of Florida (United/Centel), pursuant to Rule 25-22.060, Florida Administrative Code, move the Florida Public Service Commission (FPSC) to reconsider a portion of its Order No. PSC-94-0034-FOF-TL, issued in the above captioned Dockets on January 9, 1995, or in the alternative grant United/Centel an extension of time to comply with the below described portion of Order No. PSC-94-0034-FOF-TL. The portion of the Order that United/Centel move be reconsidered or for which an extension of time be granted, and the reasons reconsideration or an extension of time is sought, are described below.

1. United/Centel request that the Commission reconsider language in Part XIII of the Order entitled "Flexible Pricing." The language United/Centel wish to have reconsidered appears on page 45 of the Order and requires that:

"Within 90 days following the issuance of this Order or the Order on reconsideration of this Order, whichever is later, the LECs shall be required to file their zone density pricing tariffs, including supporting incremental cost data. In addition, to the extent possible, each LEC shall identify the amount of any costs such as groups [sic] specific costs that, while not directly attributable to one of these elements, is associated with this service."

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

2. The Commission overlooked or failed to consider the time it would take United/Centel to produce zone-specific incremental cost data. Order No. PSC-95-0034-FOF requires that United/Centel's zone density pricing tariffs be accompanied by supporting incremental and other associated cost data. While United can support its proposed zone-specific rates with average incremental cost data within the specified period (i.e., no later than 90 days following the issuance of the final order), zone-specific cost data will require additional time.

3. If it is the Commission's intent that United/Centel's zone-density pricing tariffs be supported by zone-specific costs studies, United/Centel will require six months to prepare this data. United/Centel therefore request that the Commission reconsider this matter and grant 180 days following the issuance of the Order or the Order on reconsideration of the Order to submit zone specific cost data, or in the alternative grant an extension of time to United/Centel until 180 days following the entry of the final order in these Dockets to submit zone-specific cost data.

Wherefore, United/Centel requests the matter discussed above be reconsidered or in the alternative that United/Centel be granted an extension of time until 180 days following the entry of the final order in these Dockets to submit its zone specific incremental cost data.

Respectfully submitted,



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Central Telephone Company of Florida  
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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail this 24th day of January, 1995 to the following:

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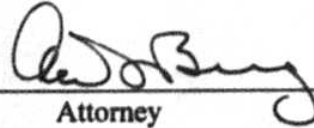
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