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November 27, 1995

HAND DELIVERY

Ms. Blanca S. Bayo, Director Division of Records and Reporting Betty Easley Conference Center 4075 Esplanade Way Tallahassee, FL 32399-0870

Re:

Docket No. 920260-TL - Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company.

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and fifteen copies of FIXCA's Response to Southern Bell's Motion for Modification in the above docket.

Please acknowledge r	eceipt of the above on the extra copy enclosed heren
CK and return it to me. Thank	you for your assistance.
IFA 3	Sincerely,
YPP	
CMU North	Dicin Haden Loughan
CWD INOTAGE	Vicki Gordon Kaufman
CTR	TION COIGON Naamian
EAC	
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5 Enclosures

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telegraph and Telephone Company.

DOCKET NO. 920260-TL FILED: November 27, 1995

FIXCA's Response to Southern Bell's Motion For Modification

The Florida Interexchange Carriers Association (FIXCA), pursuant to rule 25-22.037, Florida Administrative Code, files its response to Southern Bell Telephone and Telegraph Company's (Southern Bell) Motion for Modification. Southern Bell's Motion should be denied. As grounds therefore, FIXCA states:

- 1. On November 15, 1995, Southern Bell filed a motion requesting that the implementation date for its Extended Calling Service (ECS) tariff be moved from January 1, 1996 to December 18, 1995.
- 2. On November 28, 1995, FIXCA will file a Motion for Stay of the ECS order (Order No. PSC-95-1391-FOF-TL) and a notice of appeal to the Florida Supreme Court.
- 3. The Commission should not consider Southern Bell's Motion for Modification, and certainly should not move the ECS implementation date forward, until it rules on FIXCA's Motion for Stay. If FIXCA's motion is granted, it would halt the implementation of ECS until the conclusion of the appeal.

DOCUMENT NUMBER-DATE
11835 NOV 27 場
FFSC-RECGRDS/REPORTING

WHEREFORE, FIXCA requests that Southern Bell's motion be denied.

Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin Davidson, Rief & Bakas 117 South Gadsden Street Tallahassee, FL 32301

Attorneys for the Florida Interexchange Carriers Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Florida Interexchange Carriers Association's Response to Southern Bell's Motion for Modification has been furnished by hand delivery* or by U.S. Mail to the following parties of record, this 27th day of November, 1995:

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