

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company ) Docket No. 920260-TL  
)  
) Filed: 9/11/96  
)

MOTION FOR LEAVE TO FILE AMENDED DIRECT TESTIMONY

Intermedia Communications Inc. (ICI), hereby files this its Motion for Leave to File the Amended Direct Testimony of Thomas E. Allen, which has been filed contemporaneously with this motion. As grounds for this motion, Intermedia states as follows:

1. On August 14, 1996, Intermedia timely filed the Direct Testimony of Thomas E. Allen. Mr. Allen's testimony addressed the various proposals of the parties, and offered an additional proposal to reduce LightGate, MegaLink and SynchroNet rates (local channel and interoffice rates), and the corresponding High Capacity Service and Digital Data Access Service rates.

2. Upon review, it became apparent that Mr. Allen's testimony would be easier to respond to if it were reorganized according to the statement of issues contained in Order No. PSC-96-0965-PCO-TL, and if the testimony directly stated the principles applied in evaluating the various proposals of the parties. The amended testimony reflects these improvements, as well as editing intended to clarify Intermedia's positions on certain issues. Nevertheless, the amended testimony does not make any substantive changes to the positions taken in its precursor.

3. Intermedia believes the Amended Direct Testimony of Mr.

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Allen will be easier for other parties to respond to and will better serve the Commission in developing a complete record upon which to determine the issues before it.

4. On August 27, 1996, the Commission issued Order No. PSC 96-1099-PCO-TL extending the due date for Rebuttal Testimony until September 16, 1996. To facilitate review of the amended direct testimony, Intermedia has served the testimony, along with this motion, either by hand delivery, facsimile transmission, or overnight courier. In any event, given that Intermedia's substantive positions remain the same, Intermedia believes that no party will be prejudiced by the filing of this amended testimony.

For the reasons stated above, Intermedia Communications Inc. requests that the Commission issue an order authorizing in this docket the filing and use of the Amended Direct Testimony of Thomas E. Allen.

Respectfully submitted this 11th day of September, 1996.



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CERTIFICATE OF SERVICE

Docket No. 920260-TL

I HEREBY CERTIFY that a copy of Intermedia Communications Inc.'s Motion for Leave to File Amended Direct Testimony has been furnished this 11th day of September, 1996, to the following:

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