YOUNG, VAN ASSENDERP & VARNADOE, P. A.

ATTORNEYS AT LAW

men to

R. BHUCE ANDERSON TASHA O. HULORD DAVID L. COOF* DAVID II EHWIN C. LACOINCE MILES Annua with the side KENZA VAN ASSENDERP GEORGE L VARNADOE

October 11, 1996

GALLIE'S HALL 2-5 South ADAMS STREET, SHITE VIEW Dose Concer box Pro-TALLAHASSEE, FLORIDA 12 4 ... HILL Technology (9004) 20% (2004) TELECONER (904) 56 6834

Source Treated Transference HOT LAURE CAR CHAIL SHOPE HER Post Office Box 7907 NAMES, FLORIDA 34 ST 7507 TELEPHONE (SHILL NO / JOHA) terromen (94) 504 miles

"BOARD CENTER HEAL ESTATE LABRER

WILLIAM J. ROBERTS Or Country

ROY C. YOUNG

Ms. Blanco Bayo Director, Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Docket No. 960570-TC

Petition for waiver of rules 25-24.620(2)(c) and (d) and 25-24.515(7), F.A.C. by AmeriTel Pay Phones, Inc.

Dear Ms. Bayo:

Enclosed find the original and fifteen (15) copies of Indiantown Telephone System, Inc.'s Petition for Leave to Intervene in the above docket. Parties of record as indicated on the certificate of service have been served.

Sincerely,

David B. Erwin

DBE: akh Enclosures

cc: Jim McGinn

Cmu Lig-1 Lin-5

Sec-1

org to Do

DOCUMENT A PROTECTIVE

10916 OCT 11 8

FPSC-RECORDS/REPORTING

BEFORE THE PLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for waiver)
Of Rules 25-24.620(2)(c) and)
(d) and 25-24.515(7), F.A.C.)
by AmeriTel Pay Phones, Inc.)

Docket No. 960570-TC

Filed: October 11, 1996

INDIANTOWN TELEPHONE SYSTEM, INC.'S PETITION FOR LEAVE TO INTERVENE

Indiantown Telephone System, Inc., pursuant to Rule 25-22.039, F.A.C., hereby requests leave to intervene in these proceedings, and as grounds therefor states as follows:

- Indiantown Telephone System, Inc. is a telephone company lawfully doing business in the State of Florida pursuant to authority granted by this Commission.
- 2. Indiantown Telephone System, Inc.'s principal place of business in Florida is at

15925 S. W. Warfield Boulevard P. O. Box 277 Indiantown, Florida 34956

- 3. All pleadings and other documents in this proceeding may be served upon the undersigned attorney for Indiantown Telephone System, Inc. at the address given below.
- 4. Any decision made by the Commission in this proceeding will affect the substantial interests of Indiantown Telephone System, Inc. and its business operations. The petition in this docket asks for waiver of specified rules that affect the manner in which Petitioner can conduct business through its pay telephones located in confinement facilities. Today 0+ local and 0+ intraLATA calls are reserved to the local exchange company

DOCUMENT A PRESENCE

(LEC). If Petitioner's request for waiver is granted Petitioner could completely bypass the LEC and deprive the LEC of revenue from 0+ local and 0+ intraLATA traffic.

- 5. Even if Petitioner does not provide pay telephone service to confinement facilities in Indiantown Telephone System, Inc.'s service territory today, Petitioner has statewide authority, and Petitioner could provide such service at any time, thereby affecting Indiantown Telephone System, Inc.'s substantial interests. If Indiantown Telephone System, Inc. does not challenge the requested waiver at this time, it may have forever lost the opportunity to do so.
- 6. ALLTEL Florida, Inc., has filed a timely Petition on Proposed Agency Action in this docket, thereby already raising the issues that also affect Indiantown Telephone System, Inc.

WHEREFORE, Indiantown Telephone System, Inc. requests that the Commission grant the company leave to intervene for all legal purposes in this docket.

Respectfully submitted,

David B. Erwin

Young, van Assenderp & Varnadoe, P.A.

225 S. Adams, Ste. 200

P. O. Box 1833

Tallahassee, FL 32302

Attorneys for Indiantown Telephone System, Inc. 15925 S. W. Warfield Boulevard P. O. Box 277 Indiantown, Florida 34956

CERTIFICATE OF SERVICE DOCKET NO. 960570-TC

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail or hand delivery this 11 day of October, 1996, to the following:

Martha Brown Division of Legal Services Florida Public Service Commission P. O. Drawer 1657 2540 Shumard Oak Boulevard Tallahassee, Fl 32399-0850

Wiggins & Villacorta, P.A. 501 E. Tennessee St., Ste. B Tallahassee, FL 32301

Lee L. Willis J. Jeffry Wahlen Ausley & McMullen P. O. Box 391 Tallahassee, FL 32302

David B.