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November 2, 1998

BY HAND DELIVERY

Ms. Blanca Bayo, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket Nos. 980696-TP

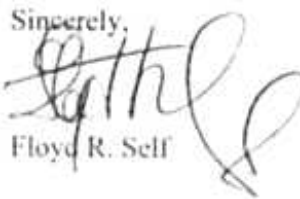
Dear Ms. Bayo:

Enclosed for filing in the above captioned dockets are an original and fifteen copies of the Joint Motion to Accept Joint Post-Hearing Brief in Excess of Page Limits on behalf of MCI Telecommunications Corporation, AT&T of the Southern States, Inc., and WorldCom Technologies, Inc.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,


Floyd R. Self

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FILED

DIVISION OF RECORDS

FRS/amb
Enclosures
cc: Parties of Record

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APP _____
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of Cost of Basic Local
Telecommunications Services)
_____)

Docket No. 980696-TP
Filed: November 2, 1998

**JOINT MOTION TO ACCEPT JOINT POST-HEARING BRIEF
IN EXCESS OF PAGE LIMITS**

Comes now AT&T Communications of the Southern States, Inc. ("AT&T"), MCI Telecommunications Corporation ("MCI"), and WorldCom Technologies, Inc. ("WorldCom") and jointly request the Commission to waive the page limitation on post-hearing statements and accept the Joint Post-Hearing Brief submitted by AT&T, MCI and WorldCom. As basis the parties would state:

1. In Order No. PSC-98-1303-PHO-TP, issued October 8, 1998, the Prehearing Officer directed that a "party's proposed finding of fact, conclusions of law, and if any, statement of issues and positions", and brief shall together total no more than 50 pages . . ." Each party to this proceeding thus is entitled to submit a post-hearing statement of 50 pages or less.

2. AT&T, MCI and WorldCom as individual parties could, pursuant to the Prehearing Order, submit three separate post-hearing statements which would total 150 pages. However, these three parties have prepared a joint post-hearing brief of 73, which exceeds the 50 page limit but is less than the total pages which could be submitted. This single filing not only reduces the documents to be reviewed by Staff and the Commission in this docket, but also reduces the individual positions which must be analyzed. If each party were to file separate statements, there would be three separate positions to restate and analyze. The single document reflects the joint position of the parties and the position need only be analyzed once rather than three times.

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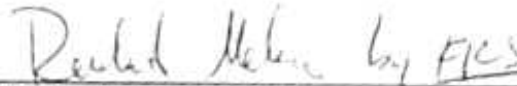
3. By accepting the Joint Post-Hearing Brief, the Commission will realize benefits and efficiencies. At the same time, no party will be affected or prejudiced.

Wherefore, AT&T, MCI and WorldCom respectfully request the Commission to accept the Joint Post-Hearing Brief.



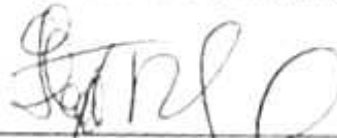
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CERTIFICATE OF SERVICE

HEREBY CERTIFY that a true and correct copy of Joint Motion to Accept Joint Post-Hearing Brief in Excess of Page Limits in Docket No 980696-TP has been furnished by Hand Delivery (*) and/or U.S. Mail to the following parties of record this 2nd day of November, 1998:

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