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February 20, 1998

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Blanca Bayo, Director
Recordings and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Quincy Telephone Company
Petition for Rule Waiver

Dear Ms. Bayo:

Enclosed please find the original and fifteen copies of the Petition of Rule Waiver on behalf of Quincy Telephone Company.

Sincerely,



David B. Erwin

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DBE:akh
Enclosure
cc: Tom McCabe

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rule Waiver)
by Quincy Telephone Company)
_____)

Docket No.:

Filed: February 20, 1998

PETITION FOR RULE WAIVER

Quincy Telephone Company (QTC), pursuant to Section 120.542(5), F.S., files this
Petition for Waiver of Rule 25-4.110(4), F.A.C., and states as follows:

1. QTC is subject to regulation by Public Service Commission rules contained in Chapter
25-4, F.A.C.

2. QTC requests a waiver of Rule 25-4.110(4), F.A.C., which states as follows:

(4) Each telephone company shall include a bill insert advising each subscriber of the directory closing date and the subscriber's opportunity to correct any error or make changes as the subscriber deems necessary in advance of the closing date. It shall also state that at no additional charge and upon the request of any residential subscriber, the exchange company shall list an additional first name or initial under the same address, telephone number, and surname of the subscriber. Such notice shall be included in the billing cycle closest to 60 days preceding the directory closing date.

3. QTC would like to inform its customers of the requirements of Rule 25-4.110(4),
F.A.C., by means of a bill message instead of through a bill insert.

4. QTC operates local exchange telephone companies in many states. In order to keep costs as low as possible, QTC attempts to standardize procedures. Advising customers of the information (or similar information) contained in Rule 25-4.110(4), F.A.C., is accomplished by a bill message (instead of a bill insert) in every state in which QTC operates, except Florida and Alabama. In order to achieve standardization, QTC is attempting to obtain permission from Florida and Alabama to use bill messages. This attempt in Florida is being made through this

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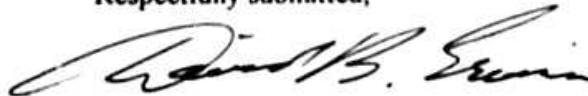
FPSC-RECORDS/REPORTING

Petition for Rule Waiver, pursuant to Section 120.542(5), F.S. Failure to grant this petition for waiver would create a "substantial hardship," as defined by Section 120.542(2), F.S. Failure to grant this petition would create unnecessary cost to QTC, without a commensurate benefit to the customers of QTC, and it would also prevent achieving uniformity and standardization of procedures.

5. One of the underlying statutes that purportedly justifies the adoption of Rule 25-4.110(4), F.S., is Section 364.03, F.S., which says in part that service provided shall be "modern, adequate, sufficient and efficient." (Section 364.03(1), F.S.) Modern technology, employed in an efficient manner, now allows information to be placed upon a bill at little cost. The more costly use of a separate bill insert is not necessary, and the customer can be informed either way, which is obviously the goal of the statute and the Commission. Consequently, if this Petition for Rule Waiver is granted, the purpose of the underlying statute is served, as required by Section 120.542(5)(d), F.S.

In consideration of the above, QTC respectfully requests approval of this Petition for Waiver of Rule 25-4.110(4), F.S.

Respectfully submitted,



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