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May 15, 1998

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket Nos. 980253-TX

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Preliminary Comments of ALLTEL Florida, Inc.

We are also submitting the Preliminary Comments on a 3.5" high-density diskette generated on a DOS computer in WordPerfect 5.1 format.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Sincerely

Thank you for your assistance in this matter.

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	FPSC-BEFORE / PEPPSTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to Initiate Rulemaking)
Pursuant to Section 120.54(5), Florida)
Statutes, to Incorporate "Fresh Look")
Requirements to All Incumbent Local)
Exchange Company (ILEC) Contracts

Docket No. 980253-TX Filed: May 15, 1998

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PRELIMINARY COMMENTS OF ALLTEL FLORIDA INC.

Pursuant to Staff's request at the April 22, 1998, rule development workshop, ALLTEL Florida, Inc. ("ALLTEL") submits the following preliminary comments on the draft rules presented by the Florida Competitive Carriers Association ("FCCA") and Time Warner AxS of Florida, Inc. ("TW").

- 1. ALLTEL supports the idea of an exemption for small LECs as contained in the drafts presented by TW and FCCA. As between the two, ALLTEL prefers the small LEC exemption approach contained in FCCA's draft.
- 2. ALLTEL reserves the right to comment on any draft rule prepared by the Staff or any other party.

DATED this 15th day of May, 1998.

J. JEFFRY WAHLEN
Ausley & McMullen
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Tallahassee, Florida 32302

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ATTORNEYS FOR ALLTEL

DOCUMENT NUMBER-DATE

05450 MAY 158

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 15th day of May, 1998, to the following:

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