



ORIGINAL

Charles J. Rehwinkel
PSC-99-0068

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January 22, 1999

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

Re: Docket No. 980696-TP Sprint-Florida, Incorporated
Motion for Reconsideration of Order PSC-99-0068-FOF-TP
And Sprint-Florida Incorporated's Request for Oral
Arguments

Dear Ms. Bayo:

Enclosed for filing are the original and fifteen (15) copies
of Sprint-Florida, Inc.'s Motion for Reconsideration of
Order PSC-99-0068-FOF-TP and Sprint-Florida, Inc.'s Request
for Oral Argument on Motion for Reconsideration of Order No.
PSC-99-0068-FOF-TP.

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

Thank you for your assistance in this matter.

Sincerely,

Charles J. Rehwinkel

RECEIVED & FILED

FPC-BUREAU OF RECORDS

CJR/th

Enclosures

- ACK _____
- AFB 2
- AT _____
- CA _____
- CD Key
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- EA _____
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- LEH 5
- OC _____
- REL _____
- SEC 1
- WAS _____
- OTH _____

Motion
DOCUMENT NUMBER DATE
U0896 JAN 22 99

Request
DOCUMENT NUMBER DATE
U0897 JAN 22 99

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Determination of the cost)
of basic local)
Telecommunications service)
pursuant to Section 364.025,)
Florida Statutes)
_____)

Docket No. 980696-TP

Filed: January 22, 1999

SPRINT-FLORIDA INCORPORATED'S REQUEST FOR ORAL ARGUMENT ON
MOTION FOR RECONSIDERATION OF ORDER NO. PSC-99-0068-FOF-TP


Pursuant to Rules 25-22.058 and 25-22.037, F.A.C., Sprint-Florida, Incorporated ("Sprint") files this Request for Oral Argument on its Motion for Reconsideration of Order No. PSC-99-0068-FOF-TP.

Sprint has requested oral argument due to the nature of the issue and the fact that the change in the Loop Investment Cap from \$10,000 to \$4,350 input was proposed without Sprint ever having notice that a disputed issue existed or that the Commission might intend to apply the BellSouth study results to Sprint.

In part Sprint's argument is that the Commission's vote may have been made while the Commissioner's were under the impression that the adjustment would not have a material impact on the company. The lack of notice and the late nature of the issue being raised, means that discussion of the factual basis underpinning Sprint's Motion for Reconsideration is crucial and requires a discussion of how the record and facts demonstrate a material impact on Sprint. The nature of the proxy model and the limitations of written explanation make such a discussion in a motion difficult.

Thus, Sprint requests a brief opportunity to present oral argument in support of the Motion for Reconsideration filed this same day.

RESPECTFULLY SUBMITTED this 22nd day of January 1998.



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CERTIFICATE OF SERVICE
DOCKET NO. 980696-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or Hand Delivery (*) this 22th day of January, 1999 to the following:

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