



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
OFFICE OF THE JUDGE ADVOCATE GENERAL
901 NORTH STUART STREET
ARLINGTON, VA 22203-1837

ORIGINAL
FILE COPY



September 9, 1992

Regulatory Law Office
U 3741

SUBJECT: In re: Southern Bell Telephone Company,
Docket No. 920260-TL

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Dear Mr. Tribble:

Enclosed are an original and 15 copies of the Department of Defense and All Other Federal Executive Agencies' Petition for Leave to Intervene in the above-styled proceeding.

Copies have been served in accordance with the attached Certificate of Service.

Sincerely,

PETER Q. NYCE, JR.
General Attorney
Regulatory Law Office

Encls

- ACK ✓
- AFA 3
- APP _____
- CAF _____
- CMU 1
- CTR _____
- EAG _____
- LEG 1
- LIN 6
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

RECEIVED & FILED

BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10428 SEP 10 1992

FPSC-RECORDS/REPORTING

BEFORE
THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: COMPREHENSIVE REVIEW OF THE)
REVENUE REQUIREMENT AND THE RATE)
STABILIZATION PLAN OF SOUTHERN BELL)
TELEPHONE AND TELEGRAPH COMPANY)

DOCKET NO. 920260-TL

PETITION FOR LEAVE TO INTERVENE
OF THE DEPARTMENT OF DEFENSE AND
ALL OTHER FEDERAL EXECUTIVE AGENCIES

CECIL O. SIMPSON, JR., General Attorney
PETER Q. NYCE, JR., General Attorney
Regulatory Law Office
Office of The Judge Advocate General
Department of the Army
Litigation Center
901 N. Stuart Street
Arlington, VA 22203-1837

Date Mailed/Federal Expressed: September 9, 1992

DOCUMENT NUMBER-DATE
10428 SEP 10 1992
FPSC-RECORDS

BEFORE
THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: COMPREHENSIVE REVIEW OF THE)
REVENUE REQUIREMENT AND THE RATE)
STABILIZATION PLAN OF SOUTHERN BELL)
TELEPHONE AND TELEGRAPH COMPANY)

DOCKET NO. 920260-TL

PETITION FOR LEAVE TO INTERVENE
OF THE DEPARTMENT OF DEFENSE AND
ALL OTHER FEDERAL EXECUTIVE AGENCIES

The Secretary of Defense, through duly authorized Counsel and on behalf of the consumer interests of the Department of Defense (DOD) and All Other Federal Executive Agencies (FEA), hereby files this Petition for Leave to Intervene in the above-captioned proceeding. This pleading is filed pursuant to the rules of practice and procedure before the Florida Public Service Commission. As grounds for the intervention, the Secretary states:

I

That the names, titles, mailing addresses and telephone and facsimile numbers of the persons to whom communications should be addressed are:

Mr. Cecil O. Simpson, Jr.
General Attorney
Mr. Peter Q. Nyce, Jr.
General Attorney
Regulatory Law Office
Office of The Judge Advocate General
Department of the Army
901 North Stuart Street
Arlington, VA 22203-1837
Telephone: (703) 696-1660
FAX: (703) 696-2960

II

That the United States maintains military installations and civilian agency activities within the State of Florida, and is a large user of Florida telephone services, particularly those services offered by Southern Bell Telephone Company. Through these proceedings, the Commission will conduct a comprehensive review of the revenue requirement and the rate stabilization plan of Southern Bell Telephone and Telegraph Company, including a consideration of Southern Bell's request for a "price regulation plan" to replace the current rate stabilization plan.

III

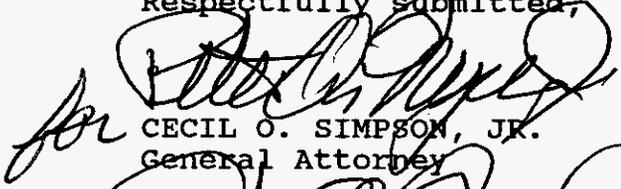
That as large users of telecommunications services provided by Southern Bell in Florida, DOD and FEA activities may be adversely and significantly impacted by the outcome of this proceeding. DOD/FEA, therefore, have a significant interest in this proceeding which cannot be adequately protected by any other party. DOD/FEA seek permission to intervene and actively participate in this proceeding.

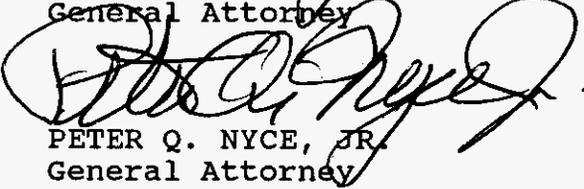
IV

That the evidence to be presented by DOD/FEA will be of material value to the Commission in its determination of the issues involved, and that this intervention will not broaden the issues or delay the proceedings.

WHEREFORE, DOD/FEA pray for leave to intervene and be treated as a party to this proceeding with a right to have notice of and appear at the taking of testimony, produce and cross-examine witnesses and be heard in person or by counsel, upon brief and at oral argument.

Respectfully submitted,


for CECIL O. SIMPSON, JR.
General Attorney


PETER Q. NYCE, JR.
General Attorney

Regulatory Law Office

Office of The Judge Advocate General
Department of the Army
JALS-RL
901 North Stuart Street
Arlington, VA 22203-1837

For

THE DEPARTMENT OF DEFENSE
And
ALL OTHER FEDERAL EXECUTIVE AGENCIES

CERTIFICATE OF SERVICE
Docket No. 920260-TL

I hereby certify that an original and 15 copies of the forgoing document have been sent to the Commission by Federal Express, and that copies have been sent by First Class U.S. Mail or by Federal Express where indicated by an asterisk (*), on September 9, 1992, to all parties on the service list.

- * Harris Anthony
Southern Bell Telephone
Telegraph Company
Suite 1910
150 W. Flagler Street
Miami, FL 33130
305-577-4491 FAX\305-530-5555
- Angela Green
Legal Department
Florida Public Service Comm.
101 East Gaines Street
Tallahassee, FL 32301
904-487-0509 FAX
904-487-2740 Telephone
- Walter D'Haeseleer
Communications Department
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301
- * Michael B. Towmey
Assistant Attorney General
Department of Legal Affairs
The Capitol
Tallahassee, FL 32399-1050
904-488-4872 FAX
904-922-6316 Telephone
- Michael J. Henry
MCI Telecommunications Corp.
MCI Center
Three Ravinia Drive
Atlanta, GA 30346-2102
- Dan Brooks Hendrickson
Florida Consumer Action Network
Post Office Box 1201
Tallahassee, FL 32302
- * Jack Shreve
Public Counsel
Charles J. Rehwinkel
Associate Public Counsel
Office of the Public Counsel
Florida House of Representatives
The Capitol
Tallahassee, FL 32399-1300
904-488-4491 FAX
904-488-9330 Telephone
- Richard D. Melson
Hopping, Boyd, Green
& Sams
Post Office Box 6526
Tallahassee, FL 32314
- * Douglas S. Metcalf
Communications Consultants, Inc.
1600 East Amelia Street
Orlando, FL 32803-5505
407-898-8656 Telephone
407-894-8467 FAX

R. Douglas Lackey
Southern Bell Telephone &
Telegraph Company
4300 Southern Bell Center
Atlanta, GA 38375

Andrew D. Lipman
Russell M. Blau
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

Michael W. Tye
AT&T Communications
106 East College Ave
Suite 1410
Tallahassee, FL 32301

* Marshall M. Criser III
SOUTHERN BELL TELEPHONE CO.
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Peter M. Dunbar
HABEN, CULPEPPER, DUNBAR et al
P.O. Box 10095
Tallahassee, FL 32301-0095

Benjamin H. Dickens
BLOOSTON, MORDKOFKY,
JACKSON & DICKENS
2120 L Street, N.W.
Washington, DC 20037

Ms. Charlotte Brayer
275 John Knox Road, EE102
Tallahassee, FL 32303

Charles W. Murphy
Staff Counsel
Florida Public Service Commission
101 Easr Gaines Street
Fletcher Building - Room 226
Tallahassee, Florida 32399-0863

Thomas R. Parker
Associate General Counsel
GTE Florida Incorporated
P.O. Box 110 MC 7
Tampa, FL 33601

Bruce Renard
Floyd Self
Messer, Vickers, Caparello
French & Madsen
P.O. Box 11876
Tallahassee, FL 32302

Craig Dingwall
General Regulatory Attorney
US Sprint Communications Co.
1850 M Street, NW
Suite 1110
Washington, DC 20036

* Charles J. Beck
OFFICE OF THE PUBLIC COUNSEL
111 W. Madison St., Rm. 801
Tallahassee, FL 32399-1400

Joseph P. Gillan
GILLAN ASSOCIATES
P.O. Box 547276
Orlando, FL 32854-7276

Major Kenneth Kitzmiller
HQ CSC/JA
Tinker AFB, OK 73145-6343

Patrick K. Wiggins
WIGGINS & VILLACORTA
501 E. Tennessee St., Suite B
Tallahassee, FL 32314

Ann Marsh, Docket Coordinator
Divn, Auditing and Fin'l Analysis
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

David Dowds, Docket Coordinator
Division of Communications
Florida Public Service Comm.
101 East Gaines Street
Tallahassee, FL 32399-0866

Ms. Vicki Kaufman
522 E. Park Ave., # 200
Tallahassee, FL 32301

Ms. Laura Wilson
P.O. Box 1876
Tallahassee, FL 32302-1876

Dated at Arlington, VA, this 9th day of September, 1992.



PETER Q. NYCE, JR.

CERTIFICATE OF SERVICE
Docket No. 920260-TL

I hereby certify that an original and 15 copies of the forgoing document have been sent to the Commission by Federal Express, and that copies have been sent by First Class U.S. Mail or by Federal Express where indicated by an asterisk (*), on September 9, 1992, to all parties on the service list.

- * Harris Anthony
Southern Bell Telephone
Telegraph Company
Suite 1910
150 W. Flagler Street
Miami, FL 33130
305-577-4491 FAX\305-530-5555
- Angela Green
Legal Department
Florida Public Service Comm.
101 East Gaines Street
Tallahassee, FL 32301
904-487-0509 FAX
904-487-2740 Telephone
- Walter D'Haeseleer
Communications Department
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301
- * Michael B. Towmey
Assistant Attorney General
Department of Legal Affairs
The Capitol
Tallahassee, FL 32399-1050
904-488-4872 FAX
904-922-6316 Telephone
- Michael J. Henry
MCI Telecommunications Corp.
MCI Center
Three Ravinia Drive
Atlanta, GA 30346-2102
- Dan Brooks Hendrickson
Florida Consumer Action Network
Post Office Box 1201
Tallahassee, FL 32302
- * Jack Shreve
Public Counsel
Charles J. Rehwinkel
Associate Public Counsel
Office of the Public Counsel
Florida House of Representatives
The Capitol
Tallahassee, FL 32399-1300
904-488-4491 FAX
904-488-9330 Telephone
- Richard D. Melson
Hopping, Boyd, Green
& Sams
Post Office Box 6526
Tallahassee, FL 32314
- * Douglas S. Metcalf
Communications Consultants, Inc.
1600 East Amelia Street
Orlando, FL 32803-5505
407-898-8656 Telephone
407-894-8467 FAX

R. Douglas Lackey
Southern Bell Telephone &
Telegraph Company
4300 Southern Bell Center
Atlanta, GA 38375

Andrew D. Lipman
Russell M. Blau
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

Michael W. Tye
AT&T Communications
106 East College Ave
Suite 1410
Tallahassee, FL 32301

* Marshall M. Criser III
SOUTHERN BELL TELEPHONE CO.
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Peter M. Dunbar
HABEN, CULPEPPER, DUNBAR et al
P.O. Box 10095
Tallahassee, FL 32301-0095

Benjamin H. Dickens
BLOOSTON, MORDKOFKY,
JACKSON & DICKENS
2120 L Street, N.W.
Washington, DC 20037

Ms. Charlotte Brayer
275 John Knox Road, EE102
Tallahassee, FL 32303

Charles W. Murphy
Staff Counsel
Florida Public Service Commission
101 Easr Gaines Street
Fletcher Building - Room 226
Tallahassee, Florida 32399-0863

Thomas R. Parker
Associate General Counsel
GTE Florida Incorporated
P.O. Box 110 MC 7
Tampa, FL 33601

Bruce Renard
Floyd Self
Messer, Vickers, Caparello
French & Madsen
P.O. Box 11876
Tallahassee, FL 32302

Craig Dingwall
General Regulatory Attorney
US Sprint Communications Co.
1850 M Street, NW
Suite 1110
Washington, DC 20036

* Charles J. Beck
OFFICE OF THE PUBLIC COUNSEL
111 W. Madison St., Rm. 801
Tallahassee, FL 32399-1400

Joseph P. Gillan
GILLAN ASSOCIATES
P.O. Box 547276
Orlando, FL 32854-7276

Major Kenneth Kitzmiller
HQ CSC/JA
Tinker AFB, OK 73145-6343

Patrick K. Wiggins
WIGGINS & VILLACORTA
501 E. Tennessee St., Suite B
Tallahassee, FL 32314

Ann Marsh, Docket Coordinator
Divn, Auditing and Fin'l Analysis
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

David Dowds, Docket Coordinator
Division of Communications
Florida Public Service Comm.
101 East Gaines Street
Tallahassee, FL 32399-0866

Ms. Vicki Kaufman
522 E. Park Ave., # 200
Tallahassee, FL 32301

Ms. Laura Wilson
P.O. Box 1876
Tallahassee, FL 32302-1876

Dated at Arlington, VA, this 9th day of September, 1992.

PETER Q. NYCE, JR.