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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of) Docket No. 920260-TL
the Revenue Requirements and Rate)
Stabilization Plan of Southern Bell)
Telephone and Telegraph Company.)
)
)
)
_____)

MOTION FOR ORAL ARGUMENT ON SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S MOTION FOR EMERGENCY RELIEF

COMES NOW Locals 3121, 3122 and 3107 Communication Workers of America, AFL-CIO ("CWA"), by and through their undersigned counsel, and files this motion for oral argument on Southern Bell Telephone and Telegraph Company's ("Southern Bell") Motion for Emergency Relief, and states:

1. On June 22, 1994 CWA filed its Petition for Hearing in response to PSC's Order No. 94-0669-FOF-TL.

ACK _____
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APP _____
GAF _____
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LEA _____
LWA _____
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WAS _____
OTH _____

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2. On June 29, 1994 Southern Bell filed a Motion for Emergency Relief to authorize Southern Bell to implement \$10 million in proposed rate reductions pursuant to the terms of Order No. PSC-94-0669-FOF-TL in response to the aforementioned Petition for Hearing and Notice of Appeal.

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3. Southern Bell's Motion for Emergency Relief is for the purpose of circumventing the remedies available to CWA as prescribed by law.

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4. This matter is of such importance to the CWA that oral arguments must be heard prior to any action being taken by the Public Service Commission.

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WHEREFORE, Locals 3121, 3122 and 3107 Communication Workers of America, AFL-CIO request the Florida Public Service Commission order a hearing on Southern Bell's Motion for Emergency relief.

Condy B. Richard for

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of America Locals 3121, 3122 and 3107
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Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Oral Argument was mailed to those individuals named on the attached distribution list on this 6th day of July, 1994.

Condy B. Richard for

MARK RICHARD, ESQ.