



April 29, 1998  
Via Overnight

210 N. Park Ave.  
Winter Park, FL  
32789

Florida Public Service Commission  
Division of Communications  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

980603-TC

P.O. Drawer 200  
Winter Park, FL  
32790-0200

Re: Petition by Telequip Labs, Inc. for exemption from rules and orders which prohibit concentration of line services for calls made from store-and-forward pay telephones located in confinement institutions

Tel 407-740-8575  
Fax 407 740-0613

Dear Sir/Madam:

tmi@tminc.com Enclosed for filing are the original and fifteen (15) copies of the above-referenced petition of Telequip Labs, Inc.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-8575.

Yours truly,

Hal Stringer  
Consultant to  
Telequip Labs, Inc.

cc: Suzanne Rettew - Telequip  
file: Telequip - FL  
cms: FLN9802

HS/lk

DOCUMENT NUMBER DATE

~~980603~~ APR 30 88

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Petition for exemption from rules )  
and orders which prohibit concentration of )  
line services for calls made from )  
store-and-forward pay telephones located )  
in confinement institutions by )  
Telequip Labs, Inc. )

Docket No. \_\_\_\_\_

**PETITION FOR WAIVER**

Pursuant to Commission Rule 25-24.505(3), Florida Administrative Code, Telequip Labs, Inc. ("Telequip") petitions the Florida Public Service Commission ("Commission") for exemption from those rules and requirements prohibiting Telequip from utilizing line concentration in the provision of store-and-forward pay telephones to inmates of confinement institutions within the state of Florida. In support of its petition, Telequip states:

1. Petitioner's name and address are:

Telequip Labs, Inc.  
1820 North Greenville Ave.  
Richardson, Texas 75081  
Telephone: (972) 390-9546  
Facsimile: (972) 437-2001

2. All notices, orders or documents regarding this petition should be directed to:

Suzanne Rettew  
Director of Business Development  
Telequip Labs, Inc.  
1820 North Greenville Ave.  
Richardson, Texas 75081  
Telephone: (972) 437-3800  
Facsimile: (972) 437-2001

and Hal Stringer  
Consultant to Telequip Labs, Inc.  
Technologies Management, Inc.  
P.O. Drawer 200  
Winter Park, FL 32790-0200  
Telephone: (407) 740-8575  
Facsimile: (407) 740-0613

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FPSC-RECORDS/REPORTING

3. Telequip is incorporated under the laws of the State of Nevada. Telequip filed concurrent with this petition, an application for Certificate to Provide Pay Telephone Service with the Commission. At this time, the company does not provide service within the State of Florida.

4. Telequip proposes in its application for a Certificate to Provide Pay Telephone Service to offer telecommunications services to inmates of confinement institutions within the state of Florida similar to services it currently offers in other jurisdictions. The Company installs sophisticated premises equipment in confinement institutions that permits inmates to make outgoing, collect-only calls without the assistance of a live operator. The company's services are provided through telephone instruments connected to a centralized call processing unit with store-and-forward capability.

Through this equipment, the company provides a number of controls and restrictions that serve to reduce or eliminate fraudulent use of telephone services. These restrictions also provide the confinement institution with increased control over the use of the telecommunications services used by inmates of the institution.

5. Telequip seeks exemption from rules and orders restricting concentration of access lines connected to its equipment and instruments. Where traffic permits, the company desires to install its call processing systems with fewer access lines than instruments. The use of line concentration allows Telequip to deploy a greater number of instruments in facility locations which would not normally warrant dedicated access lines. A greater number of telephones simplifies a confinement institution's management of inmate access to telecommunications services.

6. Rules regarding line concentration were first adopted by the Commission in Order No. 14529, issued July 1, 1985. By this order, the Commission requires one pay telephone instrument be installed per access line. Order 14529 requires one PATS instrument per access line in order to prevent a busy signal when a customer or user attempts to use the payphone during an emergency situation.

Rule 25-24.515(9), Florida Administrative Code further requires that each telephone instrument be connected as provided in the tariff for the Local Exchange Carrier ("LEC") serving the institution. LEC tariffs generally contain language which permits only one instrument per line. The exemption requested by Telequip is similar to one already granted by the Commission to ATN, Inc.<sup>1</sup> In its orders granting waivers to ATN, Inc., the Commission recognized that confinement institutions have their own emergency response systems in place and Rule 25-24.515(15), Florida Administrative Code, exempts payphones located in confinement facilities from the requirement to provide access to 911. For these reasons, the Commission describe as moot the requirement for one instrument per line with respect to emergency calls in confinement institutions.

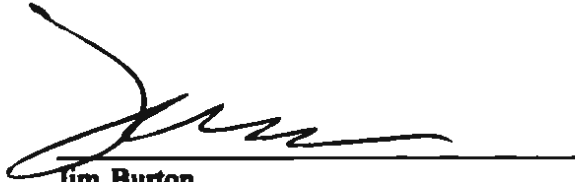
7. Telequip will design and engineer its systems so that the number of access lines installed is sufficient to support inmate call traffic during the busiest hour of the day. Should the exemption requested herein be granted, Telequip agrees to use no more than three telephone instruments per LEC access line in those institutions it will serve.

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<sup>1</sup> In Re: Petition for waiver of rules and orders which currently prohibit concentration of line services for calls made from store-and-forward coinless pay telephones located in confinement facilities, and for such other relief as may be appropriate, by ATN, Inc., Docket No. 960805-TC, Order No. PSC-96-1157-FOF-TC, Issued September 17, 1996.

WHEREFORE, Telequip Labs, Inc. respectfully requests, subject to approval of its application for certification, that it be granted exemption from the provisions of Rule 25-24.515(9), Florida Administrative Code and Order No. 14529 issued July 1, 1985 relating to line concentration, and for such other relief as may be appropriate.

Respectfully submitted this 27 day of April, 1998.



Jim Burton  
Telequip Labs, Inc.  
1820 North Greenville Ave.  
Richardson, Texas 75081