

ORIGINAL



Cannon Telephone Company

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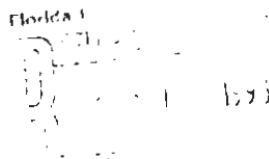
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September 14, 1998

Hon. Clintina Watts
FPSC Division of Legal Services
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850



RE: Cannon Telephone Company
Docket # 981092-TC

LEGAL DIVISION

Dear Ms. Watts:

I enclose five duplicate originals of the Amendment to the Petition for Waiver of Rules and Requirements.

An apology for the delay, I'd been visiting the Northwest English town of Keswick, where B-P has finally gotten two phone booths installed in the town square. Not only are there not phones in every room, there are few phones, period! It's a concept that definitely takes the edge off "keeping in touch."

Sincerely,

Dan Cutrer
General Counsel

- CK _____
- VFA _____
- APP _____
- CAF _____
- SMU Yambor _____
- CTP _____
- EAG _____
- LEG 1 _____
- LIR _____
- OP _____
- RCH _____
- SEL 1 _____
- WAL _____
- OTH _____

DOCUMENT NUMBER-DATE

10326 SEP 18 98

REGISTRATION REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Waiver of Rules and	§	
Requirements Prohibiting Provisions of	§	
0+ Local and 0+ Intra-LATA Calls From	§	Docket No. 981092-TC
Store and Forward Pay Telephones Located	§	
In Confinement Institutions by	§	
Cannon Telephone Company	§	

AMENDMENT TO PETITION FOR WAIVER

Pursuant to Commission Rule 25-24.505(3), Florida Administrative Code, Cannon Telephone Company ("Cannon") filed a petition with the Florida Public Service Commission ("Commission") for a waiver from those rules and requirements prohibiting Cannon from providing 0+ local and 0+ Intra-LATA calls using store-and-forward pay telephones to inmates of confinement institutions within the State of Florida. Cannon Telephone Company files this amendment to supplement its petition with information required by Florida Statute 120.542 and to request an extension of the ninety (90) day time period for processing of the instant petition.

1. Cannon believes that it will suffer a substantial hardship due to a significant loss of fraud control if the Company is forced to route 0+ local and 0+intraLATA calls to the LEC. Cannon believes that its store-and-forward technology is well suited to the provision of inmate service because it provides a number of controls and restrictions that serve to reduce or eliminate fraudulent use of pay telephone services. In addition, the Company's service eliminates the opportunity for an inmate to harass a live operator.

2. Cannon further believes that it will suffer a substantial hardship and be forced to forego substantial amounts of revenue if it is forced to route 0+ local and 0+ intraLATA calls to the LEC.

3. Cannon further believes that not granting the requested waivers would violate principles of fairness as numerous competitors to Cannon have been granted such waivers in the past by the Commission. Granting Cannon the requested waiver would ensure that Cannon is on an equal footing with its competitors when proposing service to inmate facilities.

Wherefore, Cannon Telephone Company respectfully requests, subject to approval of its Application for Certification, that it be granted a Waiver of the applicable Rules, Orders and policies currently prohibiting it from providing and billing for 0+ local and 0+ Intra-LATA calls made from store-and-forward pay telephones located in confinement

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institutions, an extension of the ninety (90) day approval period prescribed by Florida Statute 120.542(2) for processing of this waiver request, and for such other and further relief as to which it may be entitled.

Respectfully submitted this 15th day of September, 1998.

A handwritten signature in black ink, appearing to read "Dan Cutrer", written over a horizontal line.

Dan Cutrer
Corporate Secretary
5521 Greenville, Suite 104
Dallas, TX 75206