

Eric Fryson

From: Jon Moyle [jmoyle@moylelaw.com]
Sent: Wednesday, November 07, 2012 7:56 AM
To: Filings@psc.state.fl.us
Cc: Adam Teitzman; Charles Murphy; th9467@att.com; sm6526@att.com
Subject: Budget Prepay Request for Oral Argument
Attachments: Budget Request for Oral Argument.pdf

Electronic Filing

a. Person responsible for this electronic filing:

Jon Moyle
Moyle Law Firm
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
(850) 681-3828
jmoyle@moylelaw.com

b. Docket No. 120231-TP

In re: Complaint of Budget Prepay, Inc. against AT&T Florida

c. Documents being filed on behalf of Budget Prepay, Inc.

d. There are a total of 3 pages.

e. The document attached for electronic filing is Budget's Request for Oral Argument. Please let me know if you need any additional information or have questions.

Jon Moyle
jmoyle@moylelaw.com



Moyle Law Firm, P.A.
The Perkins House
118 N. Gadsden St.
Tallahassee, FL 32301
850-681-3828 (Voice)
850-681-8788 (Fax)

11/7/2012

DOCUMENT NUMBER-DATE
07493 NOV-7 2012
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of BUDGET PREPAY, INC.
Against BellSouth Telecommunications, LLC
d/b/a AT&T Florida

DOCKET NO. 120231- TP

Filed: November 7, 2012

BUDGET PREPAY, INC'S REQUEST FOR ORAL ARGUMENT

Budget Prepay, Inc. ("Budget"), by and through its undersigned counsel, pursuant to Rule 25-22.058, Florida Administrative Code, requests that the Commission provide the opportunity for oral argument to address issues raised by BellSouth Telecommunications, LLC d/b/a AT&T Florida ("AT&T") in its October 19, 2012 "Notice of Commencement of Collection Action" ("Notice") and Budget's Response to AT&T'S Notice of Commencement of Collection Action filed on November 7, 2012, contemporaneous to this request.

Oral argument would assist the Commission in understanding and evaluating issues raised by these two pleadings. Furthermore, considering AT&T's threat to disconnect Budget, action, if taken, that could disrupt the lives of more than 1,500 Floridians, the Commission should take the opportunity to hear from the parties. Budget suggests that no more than 10 minutes per side be provided.

WHEREFORE, Budget respectfully requests that the Commission grant oral argument on this issues raised in the pleadings described above.

s/ Jon C. Moyle, Jr.

Jon C. Moyle, Jr.
jmoyle@moylelaw.com
Moyle Law Firm, PA
118 North Gadsden Street
Tallahassee, FL 32301
(850) 681-3828 (Voice)
(850) 681-8788 (Facsimile)

Katherine King
Katherine.king@keanmiller.com
Randy Young
Randy.young@keanmiller.com
Randy Cangelosi
Randy.cangelosi@keanmiller.com
Carrie R. Tournillon
Carrie.tournillon@keanmiller.com
Kean Miller LLP
400 Convention Street, Suite 700
Baton Rouge, Louisiana 70802
(225) 389-3723 (Voice)
(225) 405-8671 (Facsimile)

Attorneys for Budget PrePay, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Complaint has been furnished by Electronic Mail (*), this 7th day of November 2012:

(*) Adam Teitzman
(*) Charlie Murphy
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ATeitzma@PSC.STATE.FL.US

(*) Tracy Hatch
(*) Suzanne L. Montgomery
AT&T
150 South Monroe Street, Suite 400
Tallahassee, FL 32301
Th9467@att.com
sm6526@att.com

s/ Jon C. Moyle, Jr.

Jon C. Moyle, Jr.