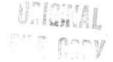


## FLORIDA CABLE TELEVISION ASSOCIATION, INC.

P.O. BOX 10383, TALLAHASSEE, FLORIDA 32302, 904/681-1990



#### VIA HAND DELIVERY

January 3, 1994

Mr. Steven C. Tribble, Director Division of Records and Reporting 101 E. Gaines Street Tallahassee, FL 32399

RE: DOCKET NOS. 920260-TL; 910163-TL; 910727-TL; 900960-TL; 911034-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced dockets are an original and fifteen (15) copies of Florida Cable Television Association, Inc.'s Motion for Additional Time to Respond to Staff's Second and Third Sets of Interrogatories. Copies have been served on the parties of record pursuant to the attached Certificate of Service.

Please acknowledge receipt and filing of the above by date stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing.

Yours very truly,

Laura L. Wilson Regulatory Counsel

Enclosures

Wim

cc: All Parties of Record

Mr. Steven E. Wilkerson

Mr. Robert J. Brillante

RECEIVED & FILET

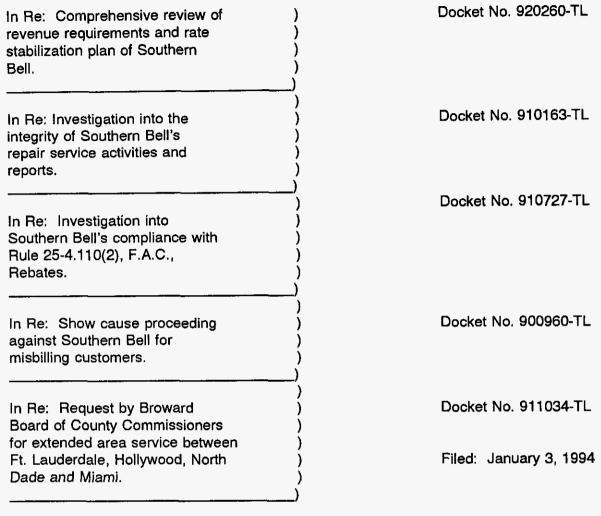
EPS BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00018 JAN-35

FPSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION



To: The Honorable Susan F. Clark
Prehearing Officer
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32399

# FLORIDA CABLE TELEVISION ASSOCIATION, INC.'S MOTION FOR ADDITIONAL TIME TO RESPOND TO STAFF'S SECOND AND THIRD SETS OF INTERROGATORIES

FLORIDA CABLE TELEVISION ASSOCIATION, INC. ("FCTA"), by and through its undersigned attorney, respectfully submits to the Florida Public Service Commission ("Commission") this Motion for Additional Time to Respond to Staff's Second and Third Sets of DOCUMENT NUMBER-DATE

00018 JAN-3#

FPSC-RECORDS/REPORTING

Interrogatories in the above-captioned docket. As grounds therefor, FCTA states:

- 1. On December 3, 1993 and December 8, 1993 Staff served to FCTA by U.S. Mail its Second and Third Sets of Interrogatories, respectively. Accordingly, FCTA's response to Staff's Second Set of Interrogatories is due January 7, 1994, and FCTA's response to Staff's Third Set of Interrogatories is due January 12, 1994.
- 2. FCTA respectfully requests additional time to respond to both Sets of Interrogatories. Although the discovery requests were placed in the mail on December 3rd and 8th, said mail was not delivered to Counsel for FCTA until December 30, 1993 (more than three weeks after service).
- 3. Requiring FCTA to adhere to the above discovery deadlines would be unduly burdensome. The current due dates would allow FCTA only one week to respond to Staff's Second Set of Interrogatories and less than two weeks to respond to Staff's Third Set of Interrogatories. In addition, FCTA's counsel scheduled the relocation of her office and legal files during the first week of January 1994. The short response time would be oppressive and extremely difficult for FCTA to meet. A two week extension until January 21, 1994 would provide FCTA the time necessary to prepare and submit a thorough response to Staff's Second and Third Sets of Interrogatories.
- 4. Counsel for FCTA has been authorized to represent that Counsel for the Commission does not object to the relief requested herein and, further, that the envelopes containing Staff's Second and Third Sets of Interrogatories to FCTA may have been incorrectly addressed.

WHEREFORE, based on the foregoing, Florida Cable Television Association, Inc. respectfully requests that the Commission grant its Motion for Additional Time to Respond to Staff's Second and Third Sets of Interrogatories and permit FCTA to respond to both Sets of Interrogatories by January 21, 1994.

Respectfully submitted,

FLORIDA CABLE TELEVISION ASSOCIATION, INC. 310 N. Monroe Street
Post Office Box 10383
Tallahassee, FL 32302

Regulatory Counsel

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Additional Time to Respond to Staff's Second and Third Sets of Interrogatories has been served by Hand Delivery (\*) and/or U.S. Mail on this 3rd day January, 1994 to the following parties of record:

Robin Norton (\*)
Divison of Communications
Florida Public Service
Commission
101 E. Gaines Street
Tallahassee, Florida 32399-0866

Angela Green (\*)
Division of Legal Services
Florida Public Service
Commission
101 E. Gaines Street
Tallahassee, Florida 32399-0863

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson & Bakas, P.A.
315 South Calhoun Street
Suite 716
Tallahassee, Florida 32301-1838

Patrick K. Wiggins Wiggins & Villacorta, P.A. P.O. Drawer 1657 Tallahassee, Florida 32302

Kenneth A. Hoffman Messer, Vickers, Caparello, Madsen, Lewis & Metz, P.A. Post Office Box 1876 Tallahassee, Florida 32302

Floyd R. Self
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, P.A.
Post Office Box 1876
Tallahassee, Florida 32302

Michael J. Henry MCI Telecommunications 780 Johnson Ferry Rd. Suite 700 Atlanta, Georgia 30342

Richard D. Melson Hopping, Boyd, Green & Sams Post Office Box 6526 Tallahassee, Florida 32314

Chanthina R. Bryant Sprint Communications Co. Limited Partnership 3065 Cumberland Circle Atlanta, Georgia 30339

Michael W. Tye AT&T Communications of the Southern States, Inc. 106 East College Ave. Suite 1410 Tallahassee, Florida 32301

Dan B. Hendrickson Post Office Box 1201 Tallahassee, Florida 32302

Benjamin H. Dickens, Jr. Blooston, Mordkofsky, Jackson & Dickens 2120 L Street, N.W. Washington, D.C. 20037 Lance C. Norris
Florida Pay Telephone
Association, Inc.
315 S. Calhoun Street
Suite 710, Barnett Bank Bldg.
Tallahassee, Florida 32301

Monte Belote
Florida Consumer Action
Network
4100 W. Kennedy Blvd. #128
Tampa, Florida 33609

Donald L. Bell 104 E. Third Avenue Tallahassee, Florida 32303

Michael A. Gross Assistant Attorney General Department of Legal Affairs PL-01, The Capitol Tallahassee, Florida 32399-1050

Douglas S. Metcalf Communications Consultants, Inc. Suite 250 631 S. Orlando Ave. Post Office Box 1148 Winter Park, Florida 32790-1148

Cecil O. Simpson, Jr.
Peter Q. Nyce, Jr.
Regulatory Law Office
Department of the Judge
Advocate General
Department of the Army
901 North Stuart Street
Arlington, Virginia 22203-1837

Michael Fannon Cellular One 2735 Capital Circle, N.E. Tallahassee, FL 32308 Joseph P. Gillan J.P. Gillan & Associates P.O. Box 541038 Orlando, Florída 32854-1038

Robert Hoeynck
Assistant County Attorney
Broward County Board of
County Commissioners
115 S. Andrew Ave.
Suite 423
Ft. Lauderdale, FL 33301

R. Douglas Lackey
Harris R. Anthony
Nancy B. White
Southern Bell Telephone &
Telegraph Co.
c/o Marshall M. Criser III
Suite 400
150 S. Monroe Street
Tallahassee, FL 32301

David M. Wells
Robert J. Winicki
William S. Graessle
Mahoney, Adams & Criser
P. O. Box 4097
Jacksonville, FL 32201

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street, Rm. 812
Tallahassee, Florida 32399-1400

C. Everett Boyd, Jr. Ervin, Varn, Jacobs, Odom & Ervin 305 S. Gadsden Street Post Office Drawer 1170 Tallahassee, Florida 32302

Lawar Milson