

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for certificate ) Docket No. 971056-TX  
to provide alternative local )  
exchange telecommunications ) Filed: May 22, 1998  
service by BellSouth BSE, Inc. )  
\_\_\_\_\_ )

FCCA'S MOTION FOR ORAL ARGUMENT

Pursuant to Rule 25-22.058, Florida Administrative Code, the Florida Competitive Carriers Association ("FCCA"), through its undersigned counsel, requests oral argument on its Motion to Compel Discovery, Motion for Leave to Supplement the Record, and Motion to Extend Deadline for Briefs filed this date and states:

1. In motions filed this date, FCCA has asserted that it is entitled to receive, review, and brief the import of a consultant's study regarding marketing plans and strategies prepared for BellSouth BSE, Inc. ("BellSouth BSE"). In its motions, FCCA contends that BellSouth BSE failed to provide the document in response to a Request to Produce Documents that FCCA timely submitted prior to the hearing. FCCA asserts it will be severely prejudiced unless the Commission affords it an opportunity to supplement the record and address the significance of the document to the issues in this case.

2. FCCA asserts that oral argument is needed and will be beneficial to the Commission's understanding of the significance of this development to FCCA's due

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process rights and to the Commission's full consideration of the important issues in this proceeding.

**WHEREFORE, FCCA moves for an Order granting oral argument on the pending motions described herein.**

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by United States mail or hand delivery(\*) this 22nd day of May, 1998, to the following:

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