

ORIGINAL

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September 11, 1998

Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 980696-TP - Determination of
the Cost of Basic Local Telecommunications
Service, Pursuant to Section 364.025, Florida
Statutes.

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of ITS Telecommunications
Systems, Inc.'s Notice of Service of Responses to Staff's First Request for Production of
Documents in the above matter. Service has been made as indicated on the Certificate of
Service. If there are any questions about this filing, please call me at 850 926 9331.

Sincerely,



David B. Erwin, Attorney
for ITS Telecommunications Systems, Inc.

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APP _____
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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re Determination of the Cost)
of Basic Local Telecommunications)
Service, pursuant to Section 364.025,)
Florida Statutes)
_____)

Docket No. 980696-TP

Filed September 11, 1998

NOTICE OF SERVICE OF ITS TELECOMMUNICATIONS
SYSTEMS, INC.'S RESPONSE TO STAFF'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS

NOTICE is hereby given that documents responsive to Staff's First Request for Production of Documents were hand delivered to William P. Cox, Staff Attorney, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida, on September 11, 1998.

The original and one copy of this Notice were hand delivered to the Director, Division of Records and Reporting at the Commission. Further service of this Notice is as set forth on the Certificate of Service.

Respectfully submitted on September 11, 1998.

By:



David B. Erwin
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Attorney for IIS Telecommunications
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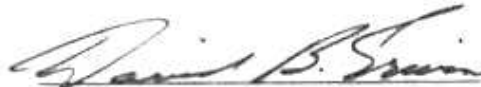
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FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I hereby certify that copies of ITS Telecommunications Systems, Inc.'s Notice of Service of Responses to Staff's First Request for Production of Documents in Docket No. 980696-TP were sent by U. S. mail on September 11, 1998, to the parties on the attached list.

A handwritten signature in black ink, appearing to read "David B. Erwin". The signature is written in a cursive style with a horizontal line underneath the name.

David B. Erwin

**CERTIFICATE OF SERVICE
DOCKET NO. 980696-1 P**

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