

ORIGINAL

LAW OFFICES
MESSER, CAPARELLO & SELF
A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701
POST OFFICE BOX 1878
TALLAHASSEE, FLORIDA 32302-1878
TELEPHONE: (850) 222-0720
TELECOPIERS (850) 224-4359, (850) 428-1942

June 2, 1998

Ms. Blanca Bayo, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

BY HAND DELIVERY

Re: Docket No. 951232-TT

Dear Ms. Bayo:

Enclosed are an original and fifteen (15) copies of:

Transcall's Response to TSI's Motion for Enlargement of Time to Serve
Answers to Interrogatories, Motion for continuance of Hearing and
Request for Expedited Consideration

for filing in the referenced docket. Please indicate receipt by stamping the enclosed extra copy of this
letter.

Thank you for your assistance in this matter.

RECEIVED & FILED

Sincerely,



Albert T. Gimbel

ACK ✓ *Mark R.*
 AFA 3
 APP _____
 CAF _____
 CMU _____ ATG:dle
 Enclosures
 CTR _____
 EAG _____ cc: Beth Keating, Esq.
 Wesley Parsons, Esq.
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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

In Re: Dade County Circuit Court referral of)
certain issues in Case No. 92-11654 (Transcall)
America, Inc. d/b/a ATC Long Distance v.)
Telecommunications Services, Inc. and)
Telecommunications Services, Inc. vs. Transcall)
America, Inc., d/b/a ATC Long Distance) that)
are within the Commission's jurisdiction.)
_____)

DOCKET NO. 951232-TI

TRANSCALL'S RESPONSE TO TSI'S MOTION FOR ENLARGEMENT OF TIME TO SERVE ANSWERS TO INTERROGATORIES, MOTION FOR CONTINUANCE OF HEARING AND REQUEST FOR EXPEDITED CONSIDERATION

Transcall America, d/b/a ATC Long Distance (Transcall) files this Response to TSI's Motion for Enlargement of Time to Serve Further Answers to Interrogatories, Motion for Continuance of Pretrial Controlling Dates and Hearing, and Request for Expedited Consideration, and in support thereof states:

ENLARGEMENT OF TIME TO SERVE ANSWERS TO INTERROGATORIES

1. Transcall opposes TSI's request for an enlargement of time to serve answers to interrogatories.
2. This matter has been pending in various forums since 1992. Transcall, the original Plaintiff in the underlying Circuit Court action, seeks to collect in excess of \$700,000.00 due and payable from TSI for long distance services rendered to TSI. Throughout this dispute TSI has maintained unsupported allegations of improper billing practices. When asked to provide the information and documentation which supports their allegations of improper billings over the last six years, TSI has failed and refused to do so.

3. When again faced with unresponsive answers to proper discovery in this docket, Transcall was forced to move to compel appropriate TSI's responses. The Commission ordered those responses filed by June 3, 1998.

4. It is imperative that Transcall receive its discovery as soon as possible so that it can properly prepare its defense in this action. The longer Transcall goes without the benefit of reviewing the documents that allegedly support TSI's allegations, the greater Transcall is prejudiced in its preparation for final hearing.

5. For all of these reasons, Transcall needs to receive proper responses to what has been deemed valid discovery without further delay.

**CONTINUANCE OF PRETRIAL
CONTROLLING DATES AND HEARING**

6. Transcall opposes TSI's request for a postponement of the hearing in this matter, but has no objection to a seven to ten day postponement of testimony and prehearing statements for all parties.

7. The Issue Identification Conference in this docket was held on December 17, 1997. The controlling dates in this docket were established at that time. Transcall raised a concern as to the sufficiency of the time periods when established. TSI's position at that time was that the dates afforded the parties adequate time to prepare and present the issues to the Commission.

8. Transcall has endeavored to fulfill its obligations within each of the time periods and is prepared to meet the deadlines as originally established; however, Transcall has no objection to a seven to ten day postponement in the testimony and prehearing statement due dates.

EXPEDITED CONSIDERATION

9. Transcall does not oppose the Commission's expedited ruling on each of these matters.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by facsimile and regular U.S. mail to: Wesley R. Parsons, Esq., Adorno & Zeder, P.A., 2601 South Bayshore Dr., Ste. 1600, Miami, Florida, 33133; and Beth Keating, Esq., Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850, this 2nd day of June, 1998.



ALBERT T. GIMBEL
Messer, Caparello & Self, P.A.
Post Office Box 1876
Tallahassee, FL 32302-1876
(850) 222-0720
ATTORNEYS FOR TRANSCALL
AMERICA, INC.