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March 27, 1997

* VIRGINIA BAR ONLY
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VIA OVERNIGHT MAIL
Office of the Chief Clerk
State of Florida
Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850


Re: Docket No. 960217-TI Initiation of Show Cause Proceedings Against
Telecuba, Inc. for Violation of Rule 25-24.470, Certificate of Public
Convenience and Necessity Required

ACK _____
AFA _____
APP 1 _____
CAF _____
CMU 1 _____
CTR _____
EAG 1 _____
LEG 1 _____
LIN 3+01 _____
OPC _____
RCH _____
SEC 1 _____
WAS _____
OTH _____

To whom it may concern:

Pursuant to the Commission's Order Establishing Procedure issued January 9, 1997 in the above-captioned proceeding (Order No. PSC-07-0047-PCO-TI) and the Commission's Rules, transmitted herewith for filing on behalf of Telecuba, Inc. are an original and fifteen copies of the Motion for Extension of Time to File Rebuttal Testimony and an original and fifteen copies of the Rebuttal Testimony of its president, Mr. Luis Coello. Please date stamp as received the extra copy of this letter and return to this office in the enclosed self-addressed stamped envelope.

If there are any questions regarding this testimony, please communicate directly with undersigned counsel for Telecuba.

Sincerely

Mitchell F. Brecher
Counsel for Telecuba, Inc.

DOCUMENT NUMBER-DATE

00235 MAR 28 1997

FPSC-RECORDS/REPORTING

cc: Will Cox, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Initiation of show cause)
proceedings against Telecuba, Inc.)
for violation of Rule 25-24.470,)
F.A.C., Certificate of Public)
Convenience and Necessity Required)
_____)

DOCKET NO. 960217-TI

DATED: March 28, 1997

MOTION FOR EXTENSION OF TIME
TO FILE REBUTTAL TESTIMONY

Telecuba, Inc. ("Telecuba"), by its undersigned counsel, hereby moves the Commission for an extension of time to file its rebuttal testimony in the above-captioned show cause proceeding. In support thereof, Telecuba states as follows:

Pursuant to the Order Establishing Procedure in this proceeding,¹ respondent's rebuttal testimony was due to be filed March 21, 1997. On March 11, 1997, undersigned counsel communicated by telephone with PSC Staff Counsel. During that conversation, undersigned counsel pointed out to Staff Counsel that several lines of the testimony of PSC Staff file March 7 had been deleted from the filed version of that testimony. Staff counsel arranged to provide

ACK _____
AFA _____ copies of the missing portions of PSC Staff testimony.

APP 1 During that same conversation, counsel for respondent asked PSC Staff counsel if Staff

CAF _____
CMU 1 would agree to a one week extension of time to file rebuttal testimony. Staff Counsel indicated

CTR _____ that a one week extension from March 21, 1997 to March 28, 1997 would be acceptable to

EAG _____
LEG 1 Staff.

LIN 34 orig testimony

OPC _____
RCH _____

SEC 1 ¹Order No. PSC-97-0047-PCO-TI, issued January 9, 1997 at page 5.

WAS _____
OTH _____

DOCUMENT NUMBER-DATE

03235 MAR 28 97

FPSC-RECORDS/REPORTING

WHEREFORE, Telecuba respectfully moves the Commission for an extension of time to file rebuttal testimony. Respondent's rebuttal testimony is being filed simultaneously with this Motion.

Respectfully submitted,

TELECUBA, INC.



Mitchell F. Brecher

FLEISCHMAN AND WALSH, L.L.P.
1400 Sixteenth Street, N.W.
Washington, DC 20036
(202) 939-7900

Its Counsel

DATED: March 28, 1997

51188.1/0909

CERTIFICATE OF SERVICE

I, Antoinette R. Mebane, hereby certify that on this 26th day of March 1997, that a true and correct copy of the foregoing *Motion for Extension of Time to File Rebuttal Testimony* in Docket No. 960217-TI, has been served via UPS Overnight Delivery to the following:

William P. Cox
Staff Counsel
Florida Public Service Commission
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850



Antoinette R. Mebane