

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Initiation of show cause ) DOCKET NO. 960217-TI  
 proceedings against Telecuba, )  
 Inc. for violation of Rule 25- ) DATED: APRIL 7, 1997  
 24.470. F.A.C., Certificate of )  
 Public Convenience and Necessity )  
 Required. )

STAFF'S RESPONSE TO TELECUBA, INC.'S  
 FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

The Staff of the Florida Public Service Commission ("Staff"), pursuant to Rule 25-22.034, Florida Administrative Code, and Rules 1.280 and 1.350, Florida Rules of Civil Procedure, hereby files its response to Telecuba, Inc.'s ("Telecuba") First Request for Production of Documents, filed March 28, 1997, and states the following:

Specific Responses

1. In response to Requests No. 1 through 6 and Requests No. 8 through 14, Staff agrees to produce the responsive documents that are in its possession.

2. Staff objects to Request No. 7 for a list of all applications and their file numbers for intrastate interexchange (IXC) telecommunications service certification and/or alternative local service (ALEC) provider certification submitted by any applicants, which have been pending for longer than sixth months from their date of filing. The subject matter of this show cause proceeding is Telecuba's provision of telecommunications service to the public through the sale of prepaid phone cards. The length of time that the Commission takes to process an application for an ALEC or an IXC certificate is not at all relevant to the issues presented in this proceeding. Therefore, the information requested

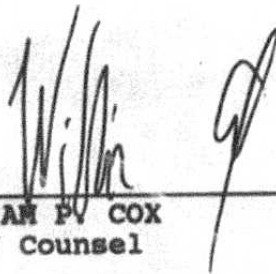
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DOCUMENT NUMBER-DATE  
 03582 APR-76  
 FPSC-RECORDS/REPORTING

STAFF'S RESPONSE TO TELECUBA'S FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS (NOS. 1 AND 2)  
DOCKET NO. 960217-TI

in Request No. 7 is not reasonably likely to lead to the discovery  
of admissible evidence.

Respectfully submitted this 4th day of April, 1997.



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WILLIAM P. COX  
Staff Counsel

Florida Public Service Commission  
Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
(904) 413-6204

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that an original and one copy of Staff's First Response to Telecuba's First Request for Production of Documents (Nos. 1 and 2) in the above referenced docket, has been served by U.S. Mail to Mitchell Brecher, Esquire, Fleischman Law Firm, 1400 16th Street NW, Washington, DC 20036, on behalf of Telecuba, Inc., and that a true and correct copy thereof has been furnished by U.S. Mail this 7th day of April, 1997, to the following:

Telecuba, Inc.  
444 Brickell Avenue  
Suite 820  
Miami, Florida 33131

  
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WILLIAM P. COX  
Staff Counsel

Florida Public Service Commission  
Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
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