



FLORIDA CABLE TELEVISION ASSOCIATION, INC.

P.O. BOX 10883, TALLAHASSEE, FLORIDA 32302, 904/681-1990

STEVEN E. WILKERSON
President

ORIGINAL
FILE COPY

VIA HAND DELIVERY

January 3, 1994

Mr. Steven C. Tribble, Director
Division of Records and Reporting
101 E. Gaines Street
Tallahassee, FL 32399

RE: DOCKET NOS. 920260-TL; 910163-TL; 910727-TL; 900960-TL; 911034-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced dockets are an original and fifteen (15) copies of Florida Cable Television Association, Inc.'s Motion for Additional Time to Respond to Staff's Second and Third Sets of Interrogatories. Copies have been served on the parties of record pursuant to the attached Certificate of Service.

Please acknowledge receipt and filing of the above by date stamping the duplicate copy of this letter and returning the same to me.

ACK ✓ Thank you for your assistance in processing this filing.

AFA ✓ Yours very truly,

ADP _____

CSE _____
CMT (circled) *Laura L. Wilson*

CPS _____
Regulatory Counsel

ENC 1 w/m
6 Enclosures

cc: All Parties of Record
Mr. Steven E. Wilkerson
Mr. Robert J. Brillante

RECEIVED & FILED
[Signature]
FPS BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
00018 JAN-3 8
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

RECEIVED
JAN 11 1994
FILE COPY

In Re: Comprehensive review of revenue requirements and rate stabilization plan of Southern Bell.)
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Docket No. 920260-TL

In Re: Investigation into the integrity of Southern Bell's repair service activities and reports.)
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Docket No. 910163-TL

In Re: Investigation into Southern Bell's compliance with Rule 25-4.110(2), F.A.C., Rebates.)
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Docket No. 910727-TL

In Re: Show cause proceeding against Southern Bell for misbilling customers.)
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Docket No. 900960-TL

In Re: Request by Broward Board of County Commissioners for extended area service between Ft. Lauderdale, Hollywood, North Dade and Miami.)
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)

Docket No. 911034-TL

Filed: January 3, 1994

To: The Honorable Susan F. Clark
Prehearing Officer
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32399

**FLORIDA CABLE TELEVISION ASSOCIATION, INC.'S
MOTION FOR ADDITIONAL TIME TO RESPOND TO
STAFF'S SECOND AND THIRD SETS OF INTERROGATORIES**

FLORIDA CABLE TELEVISION ASSOCIATION, INC. ("FCTA"), by and through its undersigned attorney, respectfully submits to the Florida Public Service Commission ("Commission") this Motion for Additional Time to Respond to Staff's Second and Third Sets of

DOCUMENT NUMBER-DATE

00018 JAN-3 94

FPSC-RECORDS/REPORTING

Interrogatories in the above-captioned docket. As grounds therefor, FCTA states:

1. On December 3, 1993 and December 8, 1993 Staff served to FCTA by U.S. Mail its Second and Third Sets of Interrogatories, respectively. Accordingly, FCTA's response to Staff's Second Set of Interrogatories is due January 7, 1994, and FCTA's response to Staff's Third Set of Interrogatories is due January 12, 1994.

2. FCTA respectfully requests additional time to respond to both Sets of Interrogatories. Although the discovery requests were placed in the mail on December 3rd and 8th, said mail was not delivered to Counsel for FCTA until December 30, 1993 (more than three weeks after service).

3. Requiring FCTA to adhere to the above discovery deadlines would be unduly burdensome. The current due dates would allow FCTA only one week to respond to Staff's Second Set of Interrogatories and less than two weeks to respond to Staff's Third Set of Interrogatories. In addition, FCTA's counsel scheduled the relocation of her office and legal files during the first week of January 1994. The short response time would be oppressive and extremely difficult for FCTA to meet. A two week extension until January 21, 1994 would provide FCTA the time necessary to prepare and submit a thorough response to Staff's Second and Third Sets of Interrogatories.

4. Counsel for FCTA has been authorized to represent that Counsel for the Commission does not object to the relief requested herein and, further, that the envelopes containing Staff's Second and Third Sets of Interrogatories to FCTA may have been incorrectly addressed.

WHEREFORE, based on the foregoing, Florida Cable Television Association, Inc. respectfully requests that the Commission grant its Motion for Additional Time to Respond to Staff's Second and Third Sets of Interrogatories and permit FCTA to respond to both Sets of Interrogatories by January 21, 1994.

Respectfully submitted,

FLORIDA CABLE TELEVISION ASSOCIATION, INC.
310 N. Monroe Street
Post Office Box 10383
Tallahassee, FL 32302

By: *Laura L. Wilson*
Laura L. Wilson
Regulatory Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Additional Time to Respond to Staff's Second and Third Sets of Interrogatories has been served by Hand Delivery (*) and/or U.S. Mail on this 3rd day January, 1994 to the following parties of record:

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