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November 10, 1997

**VIA HAND DELIVERY**

Ms. Blanca Bayó  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

971403 - TI

Re: In re: Complaint of Robert A. Butterworth, Attorney General, and the Citizens of the State of Florida, by and through Jack Shreve, Public Counsel, against LCI International for slamming David How in violation of Rule 25-4.118, F.A.C.

Dear Ms. Bayó:

Enclosed are the original and 15 copies of LCI's Motion to Approve Stipulated Extension of Time to be filed in the above docket.

ACK \_\_\_\_\_ I have enclosed an extra copy of the above documents for you to stamp and  
AFA \_\_\_\_\_ return to me. Please contact me if you have any questions. Thank you for your  
APP \_\_\_\_\_ assistance.

CAF 1 \_\_\_\_\_

CMU 1 \_\_\_\_\_

CTR \_\_\_\_\_

EAS \_\_\_\_\_

LEG 5 \_\_\_\_\_

JAM/jg

Enclosures

SEC 1 \_\_\_\_\_

WAS \_\_\_\_\_

OTH \_\_\_\_\_

Sincerely,



Joseph A. McGlothlin

DOCUMENT NUMBER-DATE

11553 NOV 10 97

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Robert A. )  
Butterworth, Attorney General, and ) Docket 971403  
the Citizens of the State of Florida, )  
by and through Jack Shreve, Public )  
Counsel, against LCI International ) Filed November 10, 1997  
for slamming David Howe in violation )  
of Rule 25-4.118, F.A.C. )

**MOTION TO APPROVE  
STIPULATED EXTENSION OF TIME**

LCI International Telecom Corp. ("LCI"), through its undersigned attorney, moves for an extension of time within which to respond to the Complaint filed by Office of Public Counsel ("OPC") and the Attorney General ("AG"), until November 26, 1997, and states:

1. On October 22, 1997, OPC and AG filed a complaint against LCI in this docket.
2. The nature of the complaint is related to Docket No. 970882-TI, in which OPC and AG have served discovery requests on LCI. LCI is in the process of providing materials responsive to a request to produce documents served on LCI in that case.
3. In this docket, LCI, OPC, and AG have scheduled a meeting to discuss their respective positions and to explore whether a basis for resolution of the complaint exists. LCI believes it would be advantageous from the standpoint of case management to extend the time for LCI's response from November 12 to November 26, 1997. This will enable LCI to respond to the complaint after OPC and AG have had an opportunity to review responses to discovery and after the scheduled meeting of the parties.

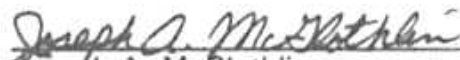
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FPSC-RECORDS/REPORTING

4. LCI has contacted counsel for OPC and for AG. LCI is authorized to represent that OPC and AG agree to the requested extension of time.

**WHEREFORE**, LCI moves for an extension of time within which to respond to the Complaint to and including November 26, 1997.

  
Joseph A. McGlothlin  
Vicki Gordon Kaufman  
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Pamela Melton  
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8180 Greensboro Drive, Suite 800  
McLean, Virginia 22101  
Telephone: (703) 610-4836

Attorneys for LCI International Telecom  
Corp.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of LCI's foregoing Motion to Approve Stipulated Extension of Time has been furnished by United States mail or hand delivery(\*) this 10th day of November, 1997:

Charles J. Beck  
Deputy Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399-1400

Michael A. Gross  
Assistant Attorney General  
Department of Legal Affairs  
The Capitol, PL-01  
Tallahassee, Florida 32399-1050

Martha Carter Brown\*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard, Room 390-M  
Tallahassee, Florida 32399-0850

  
\_\_\_\_\_  
Joseph A. McGlothlin