

ORIGINAL

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Rule 25-24.845,)
F.A.C., Customer Relations;)
Rules Incorporated, and proposed)
amendments to Rules 25-4.003,)
F.A.C., Definitions; 25-4.110,)
F.A.C. Customer Billing;)
25-4.118, F.A.C., Interexchange)
Carrier Selection; 25-24.490,)
F.A.C., Customer Relations;)
Rules Incorporated.)

DOCKET NO. ~~25-24.845~~

FILED: 1/14/98

**NOTICE OF SERVING
EXCEL TELECOMMUNICATIONS, INC.'S
RESPONSES TO FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Excel Telecommunications, Inc. (Excel) gives notice of futher response to the First Request for Production of Documents served by the Attorney General and the Office of the Public Counsel (hereafter "Attorney General/OPC") on or about September 12, 1997.

On September 25, 1997, Excel filed its NonParty Notice of General Objection to the production requests. On September 30, 1997, the Attorney General/OPC filed its First Motion to Compel against Excel. On December 12, 1997, the Commission issued Order

ACK _____ No. PSC-97-1563-PCO-TI, Order Compelling Production of Documents
AFA _____
APP _____ ("Production Order"). On December 22, 1997, Excel filed its Motion
CAF _____ for Reconsideration of the Production Order.

CMU _____ NOTICE is hereby given that Excel's continuing objections
CTR _____
EAG _____ notwithstanding, that (1) on January 14, 1998, Excel served its
LEG _____ responses to the First Set of Requests for Production of Documents
LIN _____ by the Attorney General and the Citizens by hand delivery to
OPC _____
RCH _____ Charles Beck, Deputy Public Counsel, Office of the Public Counsel,

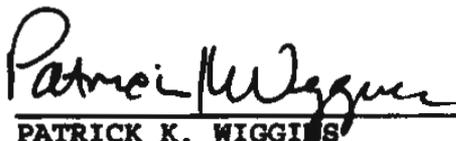
SEC _____ c/o The Florida Legislature, 111 West Madison Street, Room 2000,
WAS _____
OTH _____

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER _____ DATE _____
~~000000~~ JAN 14 8
FPSC-RECORDS/REPORTING

Tallahassee, Florida 32399-1400, and Mr. Michael A. Gross, Office of the Attorney General, Room PL-01 The Capitol, Tallahassee, Florida 32399-1050, and (2) a copy of the Notice of Service was provided to the parties listed below in the manner shown. In producing these documents, Excel does not waive and specifically reserves any general or specific objection it has to this and future discovery in this proceeding.

Respectfully submitted this 14th day of January 1998.



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Counsel for Excel
Telecommunications, Inc.

CERTIFICATE OF SERVICE

DOCKET NO. 970882-TI

NOTICE IS HEREBY GIVEN that the foregoing was furnished by hand delivery (*) or U.S. Mail this 14th day of January 1998 to the following:

Diana Caldwell
Division of Appeals
Florida Public Service Commission
2740 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Office of Public Counsel
111 West Madison Street
Tallahassee, FL 32399

Michael A. Gross*
Department of Legal Affairs
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PL-01, The Capitol
Tallahassee, FL 32399-1050

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BellSouth Telecommunications
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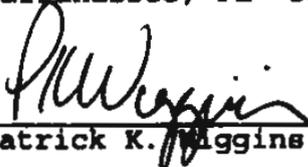
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Patrick K. Higgins