

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of show cause)	
proceeding against LCI International)	Docket No. 971487-TI
Telecom Corp for violation of)	
Rule 25-4.118, F.A.C., Interexchange)	
Carrier Selection.)	Filed: February 4, 1998
<hr/>		

MOTION FOR ORAL ARGUMENT

Pursuant to Rule 25-22.058, Florida Administrative Code, LCI International Telecom Corp (LCI), through its undersigned counsel, hereby requests oral argument on its Response to the First Motion to Compel by the Attorney General (AG) and the Citizens (OPC), which response was filed in this docket on February 4, 1998, and states:

1. This docket involves one of several existing and planned enforcement proceedings in the area of unauthorized carrier changes, which are ongoing at the same time the Commission is engaged in rulemaking in the subject. In the First Motion to Compel, OPC and AG attempt to justify certain discovery requests they submitted to LCI by arguing the information may show LCI chose not to take or implement certain measures. In LCI's response, LCI contends that AG/OPC's rationale is flawed, and in any event goes beyond the scope of this docket, which involves existing rules. Oral argument will provide an opportunity to elucidate the concepts and explain the somewhat involved legal relationships of the competing arguments as

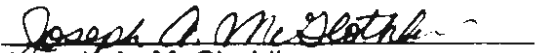
DOCUMENT FILED DATE

01818 FEB-4-98

COMMUNICATIONS SECTION

they relate to the significant issues of the proper scope of this proceeding and of discovery related to this proceeding.

WHEREFORE, LCI moves for an order setting this matter for oral argument.


Joseph A. McGlothlin
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Telephone: (850) 222-2525

Attorney for LCI International
Telecom Corp

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of LCI's foregoing Motion for Oral Argument has been furnished by Hand Delivery this 4th day of February, 1998:

John Bowman
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 390-M
Tallahassee, Florida 32399-0850

Michael A. Gross
Assistant Attorney General
Department of Legal Affairs
107 West Gaines Street
Collins Building, Room 332B
Tallahassee, Florida

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


Joseph A. McGlothlin