

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Dade County Circuit Court referral of certain issues in Case No. 92-11654 (Transcall America, Inc. d/b/a ATC Long Distance v. Telecommunications Services, Inc. and Telecommunications Services, Inc. vs. Transcall America, Inc., d/b/a ATC Long Distance) that are within the Commission's jurisdiction.

DOCKET NO. 951232-TI
Filed: March 19, 1998

TRANSCALL'S REQUEST FOR ORAL ARGUMENT ON ITS MOTION TO COMPEL ANSWERS TO INTERROGATORIES

Pursuant to Rule 25-22.058, Florida Administrative Code, Defendant, Transcall America, Inc., d/b/a ATC Long distance (hereinafter "Transcall"), by and through counsel, respectfully requests oral argument regarding Transcall's Motion to Compel Answers to Interrogatories and as grounds therefore states:

- 1. Transcall's Motion to Compel Answers to Interrogatories accompanies this Request for Oral Argument.
2. Transcall's First Set of Interrogatories contained 221 interrogatories, including

ACK 1 subparts, which TSI avoided through evasive and non-responsive answers.
AFA 3
APP
CAF
CMU 2
CTR
EAG on the issues.
LEG B. Keating

- 3. Based upon the number of interrogatories involved, Transcall believes the issues raised are best addressed by oral argument and that oral argument would facilitate disposition of the motion. Furthermore, oral argument may obviate the need to file extensive memoranda and briefs

LIN 3 4. Each interrogatory goes to the heart of TSI's case and seeks information regarding a particular allegation made by TSI in its pleadings. If such information does not exist then in due
OPC
RCH
SEC 1
WAS
QTH

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time TSI's claims will be dismissed. If such information does exist then Transcall is entitled to receive it and adequately prepare its defense.

WHEREFORE, Transcall America, Inc., d/b/a ATC Long Distance respectfully requests oral argument on its Motion to Compel Answers to Interrogatories.

Respectfully submitted,



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ATTORNEYS FOR TRANSCALL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy hereof was furnished by regular U.S. mail to: Wesley R. Parsons, Esq., 2601 S. Bayshore Drive, Coconut Grove, Florida, 33133-5419; and Beth Keating, Esq., Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850, this 14th day of March, 1998.



Albert T. Gimbel