



OFFICE OF THE ATTORNEY GENERAL

THE CAPITOL

TALLAHASSEE, FLORIDA 32399-1050

ORIGINAL

ROBERT A. BUTTERWORTH
Attorney General
State of Florida

April 17, 1998

VIA HAND DELIVERY

Blanca Bayo, Director
Department of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Initiation of Show Cause Proceeding against Minimum Rate Pricing, Inc. For
Violation of Rule 25-4.118, Florida Administrative Code, Interexchange Carrier
Selection, Docket No. 971482-TL

Dear Ms. Bayo:

Please find the enclosed original and fifteen copies of the Motion of Attorney General and
Public Counsel for Enlargement of Time to File Joint Response to Motion to Dismiss or Quash, for
More Definite Statement, and Partial Response to Order to Show Cause by Minimum Rate Pricing,
Inc. for filing in the above-mentioned proceedings. Thank you for your attention to this matter.

Sincerely,

Michael Gross
Assistant Attorney General
PL-01 The Capitol
Tallahassee, Florida 32399-1050

ACK _____
AFA _____
APP _____
850-414-3818
850-488-6589 (Fax)

CAF 1 _____
Enclosures

CMU _____
CTR _____ cc: Charles Beck
W.O. Birchfield
EAG _____ John Bowman
LEG 2 _____ William P. Cox
Jeffrey Harris
LIN _____ Eric Rubin

OPC _____ PAUSERS\SPECIAL\TRICIA\SLAMMING\LTRBB.WPD

RCH _____

SEC 1 _____

WAS _____

OTH _____

RECEIVED & FILED

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04392 APR 17 98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Initiation of Show Cause
proceeding against Minimum Rate
Pricing, Inc. for violation of Rule
25-4.118 F.A.C., Interexchange
Carrier Selection

Docket No. 971482-TI

ORIGINAL

**MOTION OF ATTORNEY GENERAL AND PUBLIC COUNSEL
FOR ENLARGEMENT OF TIME TO FILE JOINT RESPONSE
TO MOTION TO DISMISS OR QUASH, FOR MORE DEFINITE
STATEMENT, AND PARTIAL RESPONSE TO ORDER TO SHOW
CAUSE BY MINIMUM RATE PRICING, INC.**

Robert A. Butterworth, Attorney General, and Jack Shreve, Public Counsel, file this motion for an enlargement of time to file their joint response to Minimum Rate Pricing, Inc.'s Motion to Dismiss or Quash, or in the Alternative, Motion for Definite Statement, or, in the Alternative, Partial Response to Order to Show Cause, and state:

1. The response of the Attorney General and Public Counsel is currently due on or before April 20, 1998.
2. Due to preexisting commitments and time consumed in obtaining documents necessary to prepare their response, the Attorney General and Public Counsel require additional time to prepare and file their response.
3. This request is made in good faith and will not prejudice the rights of any of the parties.
4. Counsel for Minimum Rate Pricing, Inc. has been contacted and does not oppose this motion.

WHEREFORE, the Attorney General and Public Counsel respectfully request the

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Commission to enter an order granting them an enlargement of time until April 28, 1998 within which to file their joint response to Minimum Rate Pricing's defensive motion and alternative response to the Order to Show Cause.

DATED this 17th day of April, 1998.

Respectfully submitted,

Charles J. Beck
Deputy Public Counsel

Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Robert A. Butterworth
Attorney General



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Fla. Bar No. 0199461
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(850) 414-3300
FAX: (850) 488-6589

CERTIFICATE OF SERVICE
DOCKET NO. 971482-TI

I CERTIFY that a copy hereof has been furnished by U.S. Mail to the following persons
on this 17th day of April, 1998.



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