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WESLEY R. PARSONS

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June 17, 1998

Ms. Blanca Bayó, Director
 Public Service Commission
 Division of Records and Reporting
 Room 110, Easley Building
 2540 Shumard Oak Boulevard
 Tallahassee, FL 32399-0850

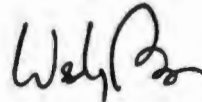
ATC v. TSI
Docket No.: 951232-TI

Dear Ms. Bayó:

Enclosed for filing with the Public Service Commission are an original and fifteen copies of TSI's Motion for Enlargement of Time to Supplement Interrogatory Responses.

Also enclosed is an additional copy of the filing, and a self-addressed stamped envelope. Please file-stamp and return the copy in the envelope.

Sincerely,



Wesley R. Parsons

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 951232-TI
FILED: October 17, 1995

In Re: Dade County Circuit Court referral of)
certain issues in Case No. 92-11654 CA 11)
(Transcall America, Inc. vs. Telecommunications)
Services, Inc. and Telecommunications Services,)
Inc. vs. Transcall America, Inc. and Advanced)
Telecommunications Corp.) that are within the)
Commission's jurisdiction.)
_____)

**TSI'S MOTION FOR ENLARGEMENT OF TIME TO
SUPPLEMENT INTERROGATORY RESPONSES**

Defendant, Telecommunication Services, Inc. ("TSI"), moves for an enlargement of time on an agreed basis to supplement its interrogatory responses, as required by the Order Granting in Part and Denying in Part Transcall's Motion to Compel. The grounds for this motion are:

1. The pre-hearing officer entered an Order on May 20, 1998, requiring TSI to supplement its interrogatory responses.
2. TSI has been unable to compile most of its supplemental response due to preparation of the final audit report of its expert, Lopez Levi & Associates, the preparation of written testimony in this matter, the large number of interrogatories, the sheer volume of material required to be reviewed, and other pressing matters. (TSI has timely complied with that portion of the order in connection with its draft expert report.)
3. TSI requests an enlargement of time of two weeks to complete its response.
4. TSI has once previously received an enlargement of time, of 14 days, in this

DOCUMENT NUMBER - DATE

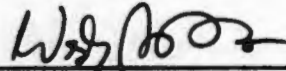
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FPSC - RECORDS & REPORTING

regard.

5. TSI's counsel consulted with Transcall's counsel on this motion, and Transcall's counsel did not take a position.

ADORNO & ZEDER, P.A.



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Attorneys for TSI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via U.S.

Mail this 17 day of June, 1998 to:

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