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RECORDS AND
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July 1, 1998

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

BY HAND DELIVERY

Re: Docket No. 951232-TI

Dear Ms. Bayo:

Enclosed are an original and fifteen (15) copies of:

Transcall's Request for Oral Argument on Motion for Protective
Order Concerning the Deposition of Floyd R. Self, Esquire

for filing in the referenced docket. Please indicate receipt by stamping the enclosed extra copy of
this letter.

Thank you for your assistance in this matter.

Sincerely,

Albert T. Gimbel

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU *ATG*
- CTR ATG:dle
- EAG Enclosures
- LEG 1
- LIN 5cc: Beth Keating, Esq.
- OF
- RCH
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[Signature]
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DOCUMENT NUMBER-DATE

06923 JUL -1 98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

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: July 1, 1998

**TRANSCALL'S REQUEST FOR ORAL ARGUMENT ON ITS
MOTION FOR PROTECTIVE ORDER CONCERNING THE DEPOSITION
OF FLOYD R. SELF, ESQUIRE**

Pursuant to Rule 25-22.058, Florida Administrative Code, Transcall America, Inc., d/b/a ATC Long distance (hereinafter "Transcall"), by and through counsel, respectfully requests oral argument on Transcall's previously filed Motion for Protective Order and as grounds therefore states:

1. Transcall's Motion for Protective Order addressing the proposed deposition of Floyd R. Self, Esquire, accompanies this Request for Oral Argument. Said Motion was filed on May 22, 1998.
2. TSI's Response to Transcall's Motion for Protective Order raises factual matters, to support the taking of the deposition, that Transcall believes are incorrect. These factual mischaracterizations obfuscate the primary thrust of TSI's proposed effort, which is to depose opposing counsel to find out everything he knows about the case.
3. Transcall respectfully suggests that the questions raised would be best addressed by oral argument and that oral argument would facilitate disposition of the motion.

DOCUMENT NUMBER-DATE

06923 JUL-1 88

FPSC-RECORDS/REPORTING

WHEREFORE, Transcall America, Inc., d/b/a ATC Long Distance respectfully requests oral argument on its Motion for Protective Order.

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 1st day of July, 1998.

ATC

**ALBERT T. GIMBEL
MESSER, CAPARELLO & SELF, P.A.
P. O. Box 1876
Tallahassee, FL 32302-1876
(850) 222-0720**

ATTORNEYS FOR TRANSCALL