

ORIGINAL

LAW OFFICES
MESSER, CAPARELLO & SELF
A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701
POST OFFICE BOX 1876
TALLAHASSEE, FLORIDA 32302-1876
TELEPHONE: (850) 222-0720
TELECOPIERS: (850) 224-4359; (850) 425-1942

RECEIVED-FPSC
98 JUL 15 PM 3:43
RECORDS AND REPORTING

July 15, 1998

BY HAND DELIVERY

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

Re: Docket No. 980703-TP

Dear Ms. Bayo:

Enclosed for filing in the captioned docket is an original and fifteen copies of Easy Cellular's Motion for Extension of Time.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

RECEIVED & FILED

Sincerely,

FPSC-BUREAU OF RECORDS

Norman H. Horton, Jr.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU 5 _____
- CTR _____
- EAG _____
- LEG 1 _____
- LIN 5 _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH _____

NHH/amb

Enclosure

cc: Glenn Richards, Esq.
Parties of Record

DOCUMENT NUMBER-DATE

07453 JUL 15 98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Easy Cellular, Inc.)
d/b/a Telcom Plus against BellSouth)
Telecommunications, Inc. for alleged)
violations of the Telecommunications)
Act of 1996 and Chapter 364 of the)
Florida Statutes)
_____)

Docket No. 980703-TP
Filed: July 15, 1998

MOTION FOR EXTENSION OF TIME

Easy Cellular, Inc. d/b/a Telcom Plus ("Easy Cellular") herewith files this Motion for Extension of Time and as basis would show:

1. On June 1, 1998, Easy Cellular filed a Complaint against BellSouth Telecommunications, Inc. ("BellSouth") for violations of the Telecommunications Act of 1996. On June 22, BellSouth filed its Answer and asserted a Counterclaim against Easy Cellular. The answer to the Counterclaim is due July 17, 1998.

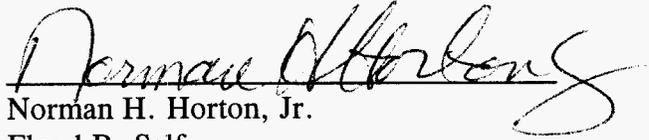
2. In order to fully review the allegations raised in the Counterclaim and develop responses, Easy Cellular would request an extension of two weeks so that the answer to the Counterclaim would be due July 31, 1998. This will afford Easy Cellular an opportunity to fully review the Complaint and confer with BellSouth.

3. Counsel for BellSouth has been advised that Easy Cellular was going to request this extension and she has no objection to the extension of time. Further, Easy Cellular does not believe that granting the extension will adversely affect any party. A hearing on this complaint is not schedule until December and the extension will not interfere with that date.

DOCUMENT NUMBER-DATE
07453 JUL 15 88
FRODO BEGINS REPORTING

WHEREFORE, Easy Cellular requests that the Commission grant a two week extension of time to file an answer to the Counterclaim.

Respectfully submitted



Norman H. Horton, Jr.

Floyd R. Self

Messer, Caparello & Self, P.A.
215 S. Monroe Street, Suite 701
P.O. Box 1876
Tallahassee, FL 32302-1876
(904) 222-0720

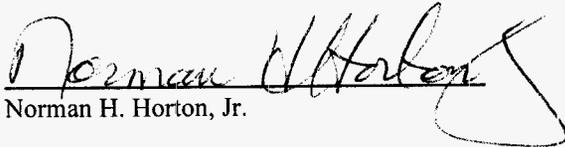
Attorneys for Easy Cellular, Inc. d/b/a Telcom Plus

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Easy Cellular's Motion for Extension of Time in Docket No. 980703-TP has been furnished by Hand Delivery (*) and/or U.S. Mail to the following parties of record this 15th day of July, 1998:

Charles Pellegini, Esq.*
Division of Legal Services
Room 370, Gunter Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Mary K. Keyer, Esq.
c/o Ms. Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301


Norman H. Horton, Jr.