

ORIGINAL

ADORNO & ZEDER
A PROFESSIONAL ASSOCIATION
2601 SOUTH BAYSHORE DRIVE
SUITE 1600
MIAMI, FLORIDA 33133
TELEPHONE (305) 856-5555
FACSIMILE (305) 856-4777
WORLD WIDE WEB <http://www.adorno.com>

WESLEY R. PARSONS

WRITER'S DIRECT NO:
(305) 860-7065

July 16, 1998

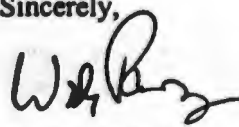
Via Federal Express
Ms. Blanca Bayó, Director
Public Service Commission
Division of Records and Reporting
Room 110, Easley Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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 Comply with Order of July 15, 1998.

Also enclosed is an additional copy to be stamped filed and returned to us in the enclosed self-addressed stamped envelope.

Sincerely,

Wesley R. Parsons

ACK _____
AFA 3 _____
APP _____
CAF _____
CMU 3 WRP/crm
CTR _____ Enclosures
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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
COMPLY WITH ORDER OF JULY 15, 1998**

Defendant, Telecommunication Services, Inc. ("TSI"), moves for an enlargement of time to comply with the Commission's Order of July 15, 1998, imposing a final deadline for TSI to supplement its interrogatory responses. The grounds for this motion are:

1. The Order, which TSI received on July 15, 1998, required TSI's compliance on July 16, 1998.
2. TSI takes its discovery obligations and the Orders of the Commission seriously. However, it cannot comply with the deadline put in place, and respectfully requests an enlargement of time of 14 days to comply.
3. TSI has been unable to compile most of its supplemental response due to the large number of interrogatories and the volume of material required to be reviewed and other pressing matters. For example, TSI's undersigned counsel has been in full-time trial each business day from July 6, 1998, to date, before a Special Master appointed by Chief United States District

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07518 JUL 17 88
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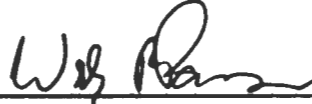
Judge Edward Davis to hear the trial of Case No. 95-1386-CIV-DAVIS, captioned Shorewood Associates, Inc. v. Resolution Trust Corporation, in the United States District Court for the Southern District of Florida.

4. Transcall has not been and will not be prejudiced by enlargements of time. TSI has produced to Transcall all documents supporting its position in this case that it was overbilled, both in the form maintained by TSI (as boxes of documents in a warehouse and at its accountant's office) and in a more organized, processed form as the accountant's workpapers supporting the accountant's report. The further discovery required is not information that will be used by TSI at the hearing before the Commission. Nevertheless, TSI has made this information, in the form it was maintained by TSI, available to Transcall.

5. TSI recognizes that the Order provides that no more enlargements will be entertained. TSI, rather than going into default of the Order, makes this further request for enlargement of time.

6. TSI's counsel has recently been involved in settlement discussions with Transcall's counsel, and has requested Transcall's agreement to a further enlargement to allow, at a minimum, settlement discussions to proceed. Counsel understands, through a telephone message yesterday, that Transcall does not agree to such request.

ADORNO & ZEDER, P.A.



Jon W. Zeder
Florida Bar No. 98432
Wesley R. Parsons
Florida Bar No. 539414
2601 South Bayshore Drive, Suite 1600
Miami, Florida 33133
Telephone No.: (305) 858-5555
Telefax No.: (305) 858-4777

Attorneys for TSI

CERTIFICATE OF SERVICE

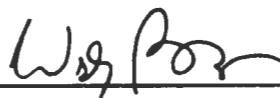
I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via U.S.

Mail this 16th day of July, 1998 to:

Albert T. Gimbel
Messer, Caparello & Self, P.A.
215 South Monroe Street, Suite 701
Tallahassee, Florida 32302-1878
(and by telefax)

Beth Keating
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32301

Kathy L. Welch, CPA
Regulatory Analyst Supervisor
Florida Public Service Commission
3625 N.W. 82nd Avenue, Suite 400
Miami, Florida 33166-7602



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