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RECORDS AND
REPORTING

July 17, 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-T1

Dear Ms. Bayo:

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

Transcall's Response to TSI's Motion for Enlargement of Time to Comply
with Order of July 15, 1998

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.

RECEIVED & FILED

[Signature]

FPSC/BUREAU OF RECORDS

Sincerely,

[Signature]

Albert T. Gimbel

- ACK
- AFA 3
- APP _____
- CAF _____
- CMU 1
- CTR _____
- EAG _____
- LEG 1
- LIN 3
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

ATG:dle
Enclosures

cc: Beth Keating, Esq.
Wesley Parsons, Esq.

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DOCUMENT ID: [redacted] DATE

JUL 17 1998

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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 17, 1998

**TRANSCALL'S RESPONSE TO TSI'S MOTION FOR ENLARGEMENT
OF TIME TO COMPLY WITH ORDER OF JULY 15, 1998**

Transcall America, Inc. d/b/a ATC Long Distance (Transcall) files this response in opposition to TSI's Motion for Enlargement of Time to Comply with Order of July 15, 1998. As grounds therefor, Transcall states:

1. Transcall vigorously opposes TSI's Motion for Enlargement of Time. TSI has had ample opportunity to comply with Transcall's discovery requests and this Commission's orders.
2. Transcall is severely prejudiced in not receiving the TSI documents that have been subject to previous orders to produce.
3. Transcall reasserts its motion for sanctions and request for attorneys' fees and costs previously filed in this proceeding on July 8, 1998.

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by regular U.S. mail to: Wesley R. Parsons, Esq., Adorno & Zeder, P.A., 2601 South Bayshore Dr., Ste. 1600, Miami, Florida, 33133, and Beth Keating, Esq., Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850, this 17th day of July, 1998.

AT Gimbel

ALBERT T. GIMBEL
Messer, Caparello & Self, P.A.
Post Office Box 1876
Tallahassee, FL 32302-1876
(850) 222-0720
ATTORNEYS FOR TRANSCALL
AMERICA, INC.