

ORIGINAL

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July 22, 1998

VIA TELEFAX AND U.S. MAIL

Wesley R. Parsons, Esq.
Adorno & Zeder, P.A.
2601 South Bayshore Dr., Ste. 1600
Miami, FL 33133

Re: *Advanced Telecommunications Corp. v. Telecommunications Services, Inc.*,
Docket No. 951232-TI

Dear Wes:

This letter is in response to your Notice of Compliance which contains a certificate of service date of July 21, 1998. Since we do not yet have the information you were directed to provide, we do not view your notice as satisfaction of the requirements of the order. For several months we have been seeking responses to properly filed discovery requests. Pursuant to our motion to compel, the Commission directed that you provide the requested responses. You were afforded several extensions of time within which you were to produce the documents, and the last order required production on July 16, 1998. That same order said that no further extensions of time would be entertained. Notwithstanding that plain language, you filed a further request for an extension of time to which we objected. We previously filed a motion for sanctions. We have reasserted that motion for sanctions and those issues remain pending.

In light of the foregoing, we believe a reasonable method of production would be to have you produce those documents to us in Tallahassee. We have previously been to Miami (on two occasions) to view documents in your possession and do not believe we should be put to the expense of returning for a third visit to view documents that should have been provided to us as early as last February.

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

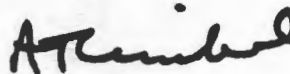
We are fast approaching the final hearing in this matter, rebuttal testimony is due Friday and it is questionable whether Transcall can derive any benefit at all from documents produced so late. We would like to work this out, and I again ask that you forward those documents to us, at your expense, by any method that insures that we receive those documents by Friday, July 24, 1998. This would at least give us the benefit of reviewing the documents over the weekend. As you know, our expert also needs to examine the documents if we are to have any kind of "meaningful" review.

DOCUMENT NO.
~~BT211-98~~
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Please contact me with your answer as soon as possible, as we would like to review the documents just as soon as we can.

Sincerely,



Albert T. Gimbel

ATG:dle

cc: Ms. Blanca Bayo, Records and Reporting
Beth Keating, Esq.

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