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RECORDS AND
REPORTING

July 29, 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 are an original and fifteen copies of Easy Cellular, Inc.'s Answer to Counterclaims of BellSouth Telecommunications, Inc.

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.
Norman H. Horton, Jr.

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- APP _____
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- WAS _____
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NHH/amb
Enclosures
cc: Glenn S. Richards, Esq.
Jaqualin Friend Peterson, Esq.
Parties of Record

DOCUMENT NUMBER-DATE

08006 JUL 29 98

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ORIGINAL

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of Easy Cellular, Inc.)	Docket No. 980703-TP
against BellSouth Telecommunications, Inc.)	
)	Filed: July 29, 1998
)	

**ANSWER TO COUNTERCLAIM OF
BELLSOUTH TELECOMMUNICATIONS, INC.**

Easy Cellular Inc. d/b/a TelCom Plus ("Easy Cellular"), in Answer to the Counterclaim of BellSouth Telecommunications, Inc. ("BellSouth"), states:

1. Paragraph 1 of the Counterclaim states legal conclusions to which no response is required. Insofar as a response is deemed necessary, Easy Cellular admits that Easy Cellular and BellSouth entered into a resale agreement which was approved by the Florida Public Service Commission (the "Commission") by order on June 12, 1997. Regarding all other factual allegations in Paragraph 1, Easy Cellular is without knowledge or information sufficient to form a belief as to the truth of such allegations in Paragraph 1.

2. The allegations in Paragraph 2 of the Counterclaim do not state allegations of fact to which Easy Cellular need respond.

3. Easy Cellular admits the Commission has jurisdiction over this dispute as alleged in Paragraph 3 of the Counterclaim.

4. Upon information and belief, Easy Cellular admits the allegations in Paragraph 4 of the Counterclaim.

5. Easy Cellular admits the allegations in Paragraph 5 of the Counterclaim.

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6. Easy Cellular admits that it entered into a resale agreement with BellSouth on March 3, 1997 (the "Agreement"), which broadly stated that Easy Cellular could purchase for resale all of BellSouth's services at a discount off of the retail rate for such services.

7. Easy Cellular admits the allegations in Paragraph 7 of the Counterclaim.

8. Easy Cellular admits the allegations in Paragraph 8 of the Counterclaim.

9. Easy Cellular admits that the Agreement in Section VII provides for certain payment and billing arrangements and that BellSouth has provided services to Easy Cellular for resale, but denies the remaining allegations in Paragraph 9 of the Counterclaim.

10. Easy Cellular denies the allegations in Paragraph 10 of the Counterclaim.

11. Easy Cellular denies the allegations in Paragraph 11 of the Counterclaim.

12. Easy Cellular admits that it has in its Complaint against BellSouth contested certain rates it charged, but denies the remaining allegations in Paragraph 12, specifically that Easy Cellular does not dispute the remaining amounts that BellSouth alleges are owed to it by Easy Cellular in this Counterclaim.

Respectfully submitted,

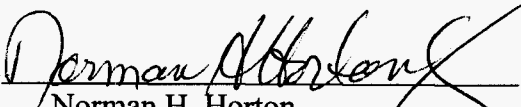
EASY CELLULAR, INC.

By: 

Glenn S. Richards
Jaqualin Friend Peterson
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& ZARAGOZA L.L.P.
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and

By:


Norman H. Horton

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Its Attorneys

Dated: July 29, 1998

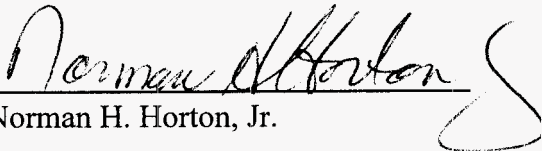
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Easy Cellular, Inc's Answer to Counterclaims of BellSouth Telecommunications, Inc. in Docket No. 980703-TP has been furnished by Hand Delivery (*) and/or U.S. Mail to the following parties of record this 29th 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.