

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the cost of basic local telecommunications service, pursuant to Section 364.025, Florida Statutes.

DOCKET NO. 980696-TP
DATED: August 18, 1998

STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
(NOS. 1-2) TO
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.
AND
MCI TELECOMMUNICATIONS CORPORATION AND MCIMETRO ACCESS
TRANSMISSION SERVICES, INC. (COLLECTIVELY, MCI)
(JOINT WITNESS)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of Staff's First Request for Production of Documents (Nos. 1-2), have been served VIA OVERNITE COURIER, upon Michael J. Henry, Esq., MCI Telecommunications, Corp., 780 Johnson Ferry Rd., Suite 700, Atlanta, GA 30342, VIA U.S. MAIL upon Richard D. Melson, Esq., Hopping Green Sams & Smith, Post Office Box 6526, Tallahassee, FL 32314, and Tracy Hatch, Esq., AT&T Communications of the Southern States, Inc., 101 N. Monroe Street #700, Tallahassee, FL 32301, on behalf of AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC. AND MCI TELECOMMUNICATIONS CORPORATION AND MCIMETRO ACCESS TRANSMISSION SERVICES, INC. (COLLECTIVELY, MCI) (JOINT WITNESS), and that a true and correct copy thereof has been furnished by U.S. Mail, this 18th day of August, 1998, to the following:

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

DOCUMENT NUMBER-DATE

08843 AUG 19 98

FPSC-RECORDS/REPORTING

DOCKET NO. 980696-TP
CERTIFICATE OF SERVICE
DATED: August 18, 1998

Ms. Harriet Eudy
ALLTEL Florida, Inc.
206 White Avenue
Live Oak, FL 32060-0550

Mark Ellmer
Post Office Box 220
502 Fifth Street
Port St. Joe, FL 32456

John Fons, Esq.
Jeffry Wahlen, Esq.
Ausley Law Firm
P.O. Box 391
Tallahassee, FL 32302

Ms. Nancy H. Sims
BellSouth Telecommunications,
Inc.
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556

e.spire Communications, Inc.
131 National Business Pkwy #100
Annapolis Junction, MD 20701

Kimberly Caswell, Esq.
GTE Florida Incorporated
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

Mr. Steven Brown
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309

David B. Erwin, Esq.
127 Riversink Road
Crawfordville, FL 32327

Laura Gallagher, Esq.
Florida Cable Telecommunications
Assoc., Inc.
310 N. Monroe Street
Tallahassee, FL 32301

Vicki Kaufman, Esq.
Florida Competitive Carriers
Assoc.
McWhirter Law Firm
117 S. Gadsden Street
Tallahassee, FL 32301

Ms. Kelly Goodnight
Frontier Communications
International, Inc.
180 S. Clinton Avenue
Rochester, NY 14646-0995

GTC, Inc.
c/o St. Joe Communications, Inc.
P.O. Box 220
Port St. Joe, FL 32456-0220

Floyd Self, Esq.
Messer Law Firm
P.O. Box 1876
Tallahassee, FL 32302

Ms. Lynne G. Brewer
Northeast FL Telephone Co., Inc.
P.O. Box 485
Macclenny, FL 32063-0485

Jack Shreve, Esq.
Office of the Public Counsel
The Florida Legislature
111 W. Madison Street #812
Tallahassee, FL 32399-1400

DOCKET NO. 980696-TP
CERTIFICATE OF SERVICE
DATED: August 18, 1998

Mr. Jim McGinn
ITS Telecommunications Systems,
Inc.
P.O. Box 277
Indiantown, FL 34956

Michael Gross, Esq.
Office of the Attorney General
Department of Legal Affairs
The Capitol, PL-01
Tallahassee, FL 32399-1050

David Swafford, Esq.
Barbara Auger, Esq.
Peter Dunbar, Esq.
Pennington Law Firm
P.O. Box 10095
Tallahassee, FL 32301

Suzanne F. Summerlin, Esq.
Supra Telecom & Information
Systems, Inc.
Suite 201
1311-B Paul Russell Rd
Tallahassee, FL 32301

Ms. Carolyn Marek
Time Warner Communications
P.O. Box 210706
Nashville, TN 37221

Supra Telecommunications &
Information Systems
P.O. Box 144122
Miami, FL 33114-4122

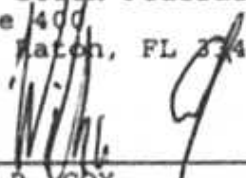
Mr. Bill Huttenhower
Vista-United Telecommunications
P.O. Box 10180
Lake Buena Vista, FL 32830-0180

Thomas M. McCabe, Esq.
TDS Telecom/Quincy Telephone
P.O. Box 189
Quincy, FL 32353-0189

Patrick Wiggins, Esq.
Donna Canzano, Esq.
Wiggins Law Firm
P.O. Drawer 1657
Tallahassee, FL 32302

Kenneth Hoffman, Esq.
TCG South Florida
Rutledge Law Firm
P.O. Box 551
Tallahassee, FL 32302-0551

Mr. Brian Sulmonetti
WorldCom Technologies, Inc.
1515 South Federal Highway
Suite 400
Boca Raton, FL 33432-7404



WILLIAM P. COX
Staff Counsel
FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(850) 413-6199