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Florida Cable Telecommunications Association

RECORDS AND REPORTING

Steve Wilkerson, President

**VIA HAND DELIVERY**

August 20, 1998

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**RE: Docket No. 980896-TP**

Dear Ms. Bayo:

Enclosed for filing in the above referenced docket are the original and 15 copies of the following:

1. FCTA's Notice of Withdrawal of Motion for Order Compelling BellSouth Responses to Discovery; and **D 8978-98**
2. FCTA's Notice of Withdrawal of Motion for Order Compelling Sprint Responses to Discovery. **D 9979-98**

Copies of the Notices have been served on the parties of record pursuant to the attached certificates of service. Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in process this filing. Please contact me with any questions.

Yours very truly,

RECEIVED & FILED

*Laura L. Gallagher*  
Laura L. Gallagher

*[Signature]*  
FPSC - BUREAU OF RECORDS

Vice President, Regulatory Affairs &  
Regulatory Counsel

LLG/mj

cc: All Parties of Record  
Steven E. Wilkerson

- ACK
- AFB
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

DOCUMENT NUMBER - DATE

08978 AUG 20 98

RECORDS AND REPORTING

DOCUMENT NUMBER - DATE

08978 AUG 20 98

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost of Providing )  
Basic Local Telecommunications Service, )  
Pursuant to Section 364.025, Florida )  
Statutes )

Docket No. 980696-TP  
Filed: August 20, 1998

FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION'S  
NOTICE OF WITHDRAWAL OF MOTION FOR ORDER  
COMPELLING SPRINT RESPONSES TO DISCOVERY

Florida Cable Telecommunications Association, Inc. (FCTA), by and through undersigned counsel, hereby serves this notice of withdrawal of FCTA's Motion for Order Compelling Sprint Responses to Discovery filed on August 6, 1998 in the above-captioned proceeding. FCTA sought responses to Interrogatory Numbers 4 and 5 in the motion. On August 14, 1998, Sprint responded to Interrogatory Number 4. On the same date, Sprint agreed to provide a response and associated documentation for Interrogatory Number 5 pursuant to the attached letter of Charles Rehwinkel dated August 14, 1998. In an effort to expeditiously resolve the discovery dispute and conserve the Commission's resources, FCTA accepts Sprint's responses and withdraws its Motion for Order Compelling a Response to Interrogatory Numbers 4 and

- ACK 5
- AFA 2
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU King
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2
- LIN 5
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Respectfully submitted this 20<sup>th</sup> day of August, 1998.

  
\_\_\_\_\_  
Laura L. Gallagher  
Vice President-Regulatory Affairs  
Florida Cable Telecommunications Association  
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Attorney for FCTA

DOCUMENT NUMBER - DATE  
**08979 AUG 20 1998**  
FPC-RECORDS/REPORTING

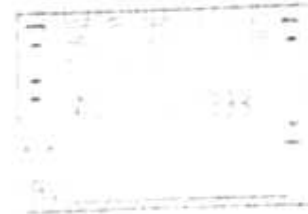


Charles J. Rehwinkel  
General Counsel

155-10-2214  
Tallahassee, FL 32310  
Mobile: 904-499-0000  
Home: 904-499-0000  
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August 14, 1998

Laura L. Gallagher  
Vice President, Regulatory Affairs  
Florida Cable Telecommunications Association  
310 North Monroe Street  
Tallahassee, Florida 32301



Re: Discovery responses in docket No. 980696-TP

Dear Laura:

Enclosed is the discovery response to your First Set of Interrogatories and the First and Second Requests for Production of Documents. The requests related to the AT&T discovery will be fulfilled as soon as we have completed the AT&T responses. Interrogatory No. 5 and the associated document production are still being answered. I expect to have that answer by Monday and will hand deliver those responses to you.

I apologize for any delay in the response beyond what John Fons indicated. I assure you that the delay occurred on our end and not with John. I hope that going forward Sprint will be able to respond in a more timely fashion.

Please call me at 850/8457-0244 if you have any questions.

Sincerely,

Charles J. Rehwinkel

Enclosure

cc: John Fons

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Withdrawal of Motion for Order Compelling Sprint Responses to Discovery has been furnished by hand delivery (\*) and U.S. Mail this 20th day of August, 1998, to the following:

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