



JACK SHREVE
PUBLIC COUNSEL

STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison St.
Room 812
Tallahassee, Florida 32399-1400
850-488-9330

ORIGINAL

September 11, 1998

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

Re: Docket No. 980733-TL

Dear Ms. Bayo:

Enclosed for filing in the above-references docket are the original and 15 copies of the Citizens' response in support of the Attorney General's motions to compel.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck
Deputy Public Counsel

ACK _____
AFA 2
APP _____
CAF _____ GJB:bsr
CMU _____
CTR _____ Enclosures
EAG _____
LEG 2
LIN _____
OPC _____
RCH 2
SEC 1
WAS _____
OTH _____

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
09969 SEP 11 88
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Discovery and related study on fair)	
and reasonable rates and on relationships)	
among costs and charges associated)	Docket 980733-TL
with certain telecommunications services)	
provided by local exchange companies)	Filed September 11, 1998
(LECs), as required by Chapter 98-277,)	
Laws of Florida.)	

CITIZENS' RESPONSE IN SUPPORT OF THE ATTORNEY GENERAL'S MOTIONS TO COMPEL

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel file this response to the motions to compel filed by the Attorney General and state that the Citizens support the motions filed by the Attorney General.

Respectfully submitted,

JACK SHREVE
PUBLIC COUNSEL

Charles J. Beck
 Charles J. Beck
 Deputy Public Counsel
 Florida Bar #217281

Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Attorneys for the Citizens
of the state of Florida

DOCUMENT NUMBER-DATE

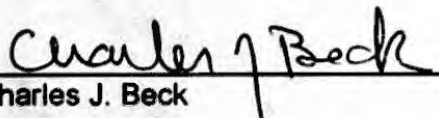
09969 SEP 11 88

FPSC-RECORDS/REPORTING

**DOCKET NO. 980733-TL
CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail or hand-delivery to the following parties on this 11th day of September, 1998.


Charles J. Beck

Martha Carter Brown
Division of Legal Services
Fla. Public Service Commission
2740 Shumard Oak Blvd.
Tallahassee, FL 32399-0863

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

Michael A. Gross
Assistant Attorney General
Department of Legal Affairs
PL-01, The Capitol
Tallahassee, FL 32399-1050

Ann Marsh
Division of Communications
Fla. Public Service Commission
2740 Shumard Oak Blvd.
Tallahassee, FL 32399-0863

Charles Rehwinkel
Sprint-Florida, Inc.
1313 Blair Stone Road
MC FLTH00107
Tallahassee, FL 32301

Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street
Suite 400
Tallahassee, FL 32301

David B. Erwin
Attorney-at-Law
127 Riversink Road
Crawfordville, FL 32327

Jeff Wahlen
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301

Edward Paschall
120 E. Jefferson
2nd Floor
Tallahassee, FL 32301

Benjamin Ochshorn
Florida Legal Services, Inc.
2121 Delta Blvd.
Tallahassee, FL 32303

Laura L. Gallagher
Vice President-Regulatory Affairs
Florida Cable Telecommunications Assoc.
310 N. Monroe Street
Tallahassee, FL 32301

Norman Horton
Messer Law Firm
P.O. Box 1876
Tallahassee, FL 32302

Joseph McGlothlin
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 S. Gadsden St.
Tallahassee, FL 32301

Kenneth Hoffman
c/o Rutledge Law Firm
P.O. Box 551
Tallahassee, FL 32302-0551

Donna Canzano
Wiggins & Villacorta, P.A.
P.O. Box 1657
Tallahassee, FL 32302

Charles Murphy
House Committee on Utilities
& Communications
428 House Office Bldg.
Tallahassee, FL 32399-11300

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

Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
Post Office Box 1876
Tallahassee, FL 32302-1876

Rick Melson
Hopping Law Firm
P.O. Box 6526
Tallahassee, FL 33619-1309

Monica Barone
Sprint Communications
3100 Cumberland Circle, #802
Atlanta, GA 30339

Tracy Hatch
AT&T Communications
Suite 700
101 N. Monroe St.
Tallahassee, FL 32301

David M. Frank
1403 Maclay Commerce Drive
Suite 3
Tallahassee, FL 32312

James C. Falvey, Esq.
e.spire Communications, Inc.
133 National Business Parkway
Suite 200
Annapolis Junction, MD 20701

Mr. Brian Sulmonetti
World Com, Inc.
1515 S. Federal Highway
Suite 400
Boca Raton, FL 33432