

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: September 14, 1998

STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 2)
TO ITS TELECOMMUNICATIONS SYSTEMS, INC. (ITS)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of Staff's Request for Production of Documents has been served **VIA U.S. MAIL**, to David B. Erwin, Esquire, 127 Riversink Road, Crawfordville, FL 32327, and Robert N. Post, Jr., Post Office Box 277, Indiantown, Florida 34956, this 14th day of September, 1998, and that a true and correct copy thereof has been furnished by U.S. Mail to the following:

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

Ms. Rhonda Merritt
Tracy Hatch, Esq.
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301-1549

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

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

DOCUMENT NUMBER-DATE

10114 SEP 15 98

FPSC-RECORDS/REPORTING

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

DOCKET NO. 980696-TP
CERTIFICATE OF SERVICE

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

Richard Melson, Esq.
Hopping Law Firm
P.O. Box 6526
Tallahassee, FL 32314

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

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

Michael J. Henry, Esq.
MCI Telecommunications Corp.
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30342

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

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

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

DOCKET NO. 980696-TP
CERTIFICATE OF SERVICE

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

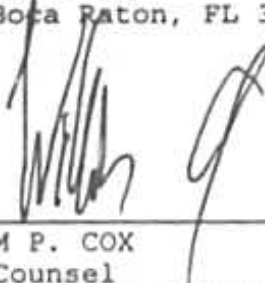
Thomas M. McCabe, Esq.
TDS Telecom/Quincy Telephone
P.O. Box 189
Quincy, FL 32353-0.89

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

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

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

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