

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for Emergency Relief of Supra)
Telecommunications and Information)
Systems, Inc., Against BellSouth)
Telecommunications, Inc.)

Docket No. 980800-TP
Filed: September 21, 1998

RECORDS AND
REPORTING

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MOTION FOR LEAVE TO FILE REBUTTAL TESTIMONY OF
MARK C. GRAHAM ON SEPTEMBER 21, 1998,
PURSUANT TO THE STIPULATION OF THE PARTIES

Supra Telecommunications and Information Systems, Inc., by and through its undersigned counsel, hereby moves the Commission for leave to file the rebuttal testimony of Mark C. Graham in this proceeding on September 21, 1998, and as grounds therefor states:

1. Supra Telecommunications and Information Systems, Inc., requested the consent of BellSouth and the Staff to file the rebuttal testimony of Stephen L. Dillon on September 21, 1998. BellSouth and the Staff gave their consent to the extension of the September 17, 1998, rebuttal testimony deadline which had already been extended by agreement of the parties to Friday, September 18, 1998. The basis for Supra's request was that Supra had only located Mr. Dillon, as a potential expert witness, on September 16, 1998, and Mr. Dillon had not had an opportunity to view the videotapes of the two central offices involved in this matter. Supra had previously diligently searched for an expert witness for this proceeding without any success.

AFA _____
APP _____
CAF _____
CMU Stuvaya
STR _____
EAG _____
LEG 1 _____
LIV 3 _____
OPC _____
RCH _____
SEC _____
WAS _____
OTH _____

DOCUMENT NUMBER-DATE

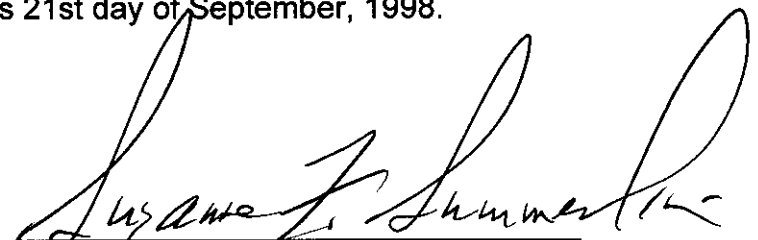
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FPSC-RECORDS/REPORTING

2. On September 18, 1998, Supra sent Mr. Dillon copies of the videotapes of the two central offices. However, Mr. Dillon reported to Supra on September 20, 1998, that he would not be able to testify for Supra because of his time constraints. Therefore, Supra was forced to find a substitute witness for this testimony. Supra has, therefore, filed the rebuttal testimony of Mark C. Graham this date, September 21, 1998.
3. As Supra is filing the rebuttal testimony of Mark C. Graham this date pursuant to the stipulation of the parties, Supra requests that the Commission accept this testimony though not filed in accordance with the date for rebuttal testimony set out in the Commission's procedural order for this matter.

Wherefore, Supra respectfully requests the Commission to grant it leave to file the rebuttal testimony of Mark C. Graham on September 21, 1998, pursuant to the stipulation of the parties.

Respectfully submitted, this 21st day of September, 1998.



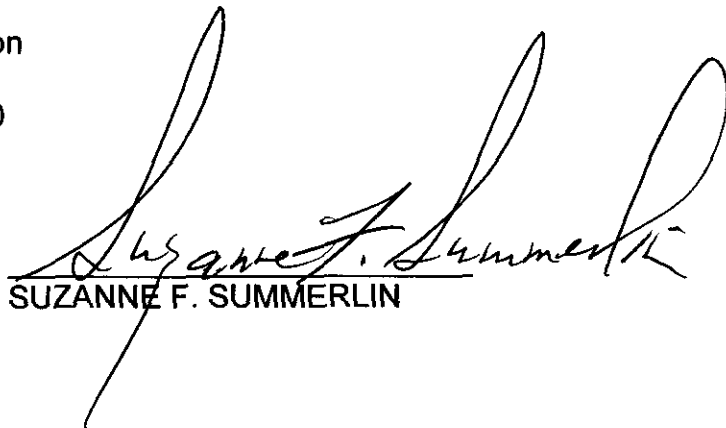
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(850) 656-2288

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing
was furnished by hand delivery to the following individuals this 21st day of
September, 1998:

Nancy B. White, Esq.
c/o Ms. Nancy Sims
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