

David B. Erwin
Attorney-at-Law

127 Riversink Road
Crawfordville, Florida 32327

Phone 850.926.9331
Fax 850.926.8448
derwin@lewisweb.net

October 6, 1998

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

Re: Docket No. 980696-TP
Determination of the Cost of Basic
Local Telecommunications Service, Pursuant
to Section 364.025, Florida Statutes

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of ITS Telecommunications Systems, Inc.'s Notice of Service of Response to Staff's Second Set of Interrogatories (Nos. 2 and 3) in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions about this filing, please call me at 850.926.9331.

Sincerely,



David B. Erwin, Attorney
for ITS Telecommunications Systems, Inc.

ACK _____

AFA _____

APP _____

CAF _____ DBE:jm

CMU _____

CTR _____

EAG _____

LEG _____

LIN _____

OPC _____ TIS2:jm

RCH _____

SEC 1 _____

WAS _____

OTH _____

DOCUMENT NUMBER DATE

10998 OCT-6 98

REC'D-RECORDS & REPORTING

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

Filed: October 6, 1998

**NOTICE OF SERVICE OF
ITS TELECOMMUNICATIONS SYSTEMS, INC.'S
RESPONSE TO STAFF'S SECOND SET OF
INTERROGATORIES (NOS. 2 AND 3)**

NOTICE is hereby given that a true and correct copy of ITS Telecommunications Systems, Inc.'s Response to Staff's Second Set of Interrogatories (Nos. 2 and 3) was hand delivered to William P. Cox, Staff Attorney, at 2540 Shumard Oak Boulevard, Tallahassee, Florida on October 5, 1998. Further service was accomplished as shown on the Certificate of Service attached hereto.

Respectfully submitted on October 6, 1998.

By:



David B. Erwin
127 Riversink Road
Crawfordville, FL 32327

Attorney for ITS
Telecommunications Systems, Inc.

CERTIFICATE OF SERVICE

I HERBY CERTIFY that copies of ITS Telecommunications Systems, Inc.'s Response to Staff's Second Set of Interrogatories (Nos. 2 and 3), were sent via U. S. Mail on October 6, 1998 to the parties on the attached list.

A handwritten signature in cursive script, appearing to read "David B. Erwin".

David B. Erwin

**CERTIFICATE OF SERVICE
DOCKET NO. 980696-TP**

Jack Shreve/Charles Beck
Office of Public Counsel
111 W. Madison Street, Rm. 812
Tallahassee, Florida 32399-1400

Michael Gross, Assistant Attorney General
Office of the Attorney General
PL-01 The Capitol
Tallahassee, Florida 32399-1050

Monica Barone
Sprint
3100 Cumberland Circle
Atlanta, Georgia 30339

Charlie Murphy/Booter Imhof
House Committee on Utilities and Communications
428 House Office Building
Tallahassee, Florida 32399-1300

Tracy Hatch
AT&T
101 N. Monroe Street, Suite 700
Tallahassee, Florida 32301

Richard D. Melson
Hopping, Green, Sams & Smith, P.A.
Post Office Box 6526
Tallahassee, Florida 32314

Charles Rehwinkel
Sprint-Florida, Inc.
1313 Blair Stone Road, MC FLTH00 107
Tallahassee, Florida 32301

Joe McGlothlin
117 S. Gadsden Street
Tallahassee, Florida 32301

David Daniel
House Democratic Office
316, The capitol
402 S. Monroe Street
Tallahassee, FL 32399-1300

John Fons/Jeff Wahlen
Ausley & MacMullen
227 S. Calhoun Street
Tallahassee, Florida 32301

Floyd Self/Doc Horton
Post Office Box 1876
Tallahassee, Florida 32302

Susan Masterton
Senate Committee on Regulated Industries
418 Senate Office Building
Tallahassee, Florida 32399

Kimberly Caswell
GTE Florida Incorporated
Post Office Box 110, FLT00007
Tampa, Florida 33601

Tom McCabe
TDS Telecom
Post Office Box 189
Quincy, FL 32353-0189

Peter M. Dunbar/Barbara D. Auger
Pennington, Moore, Wilkinson, & Dunbar, P. A.
Post Office Box 10095
Tallahassee, Florida 32302-2095

Ed Paschall, AARP
1923 Atapha Nene
Tallahassee, FL 32301-5850

Ben Ochshorn
Florida Legal Services
2121 Delta Boulevard
Tallahassee, Florida 32303

Kelly Goodnight
Frontier Communications
180 So. Clinton Avenue
Rochester, New York 14646

Laura Gallagher
Florida Cable Telecommunications Association, Inc.
310 N. Monroe Street
Tallahassee, Florida 32301

Michael Twomey
8903 Crawfordville Road
Tallahassee, Florida 32310

Mark Ellmer/Bill Thomas
GTC, Inc.
Post Office Box 220
Port St. Joe, Florida 32457

Bill Huttenhower
Vista-United
Post Office Box 10180
Lake Buena Vista, Florida 32830

Julie S. Myers
311 E. Park Avenue
Tallahassee, Florida 32301

Everett Boyd
P. O. Drawer 1170
Tallahassee, Florida 32302

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

Nancy B. White/ Robert G. Beatty
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301

Harriet Eudy
ALLTEL
206 White Avenue
Live Oak, Florida 32060

Lynne G. Brewer
Northeast Florida Telephone Company
Post Office Box 485
Macedenny, Florida 32063

Angela Green
1255 S. Gadsden Street, #200
Tallahassee, Florida 32301

Connie Shivers
Holland Law Firm
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301

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

Richard (Dick) L. Spears, Legislative Chrmn.
Community Associations Institute
9132 Ridge Pine Trail
Orlando, FL 32819

Suzanne F. Summerlin, Esq.
1311-B Paul Russell Road, Suite 201
Tallahassee, FL 32301

Tamar E. Finn
Swidler Berlin Shereff Friedman, LLP
3000 K. Street, N. W., Suite 300
Washington, DC 20007-5116

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

Brian Sulmonetti
World/Com Technologies, Inc.
1515 So. Federal Highway, Suite 400
Boca Raton, FL 33432-7404

Robert M. Post, Jr.
ITS Telecommunications Systems, Inc.
Post Office Box 277
Indiantown, Florida 34956

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

Susan Weinstock
AARP-State Legislation Department
601 E. Street N. W.
Washington, D. C. 20049

William P. Cox
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850