

ORIGINAL

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NOV 30 PM 3:18
RECORDS AND REPORTING

November 30, 1998

BY HAND DELIVERY

Ms. Blanca Bayo, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 980703-TP

Dear Ms. Bayo:

Enclosed for filing in the above captioned docket on behalf of Easy Cellular, Inc. are an original and fifteen copies of Easy Cellular's Notice of Intent to Object to BellSouth's First Set of Interrogatories and First Request for Production of Documents.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

Thomas A. Suter

Thomas A. Suter

ACK _____
AFA _____
APP _____
CAF _____
RECEIVED & FILED
Ruth Nettles
FPSC-BUREAU OF RECORDS

CMU *Cordiano*
TAS/amb

CTR _____ Enclosures
EAG _____ cc: Glenn Richards, Esq.
LEG _____ Parties of Record

LIN 3

OPC _____

RCH _____

SEC 1

WAS _____

JTH _____

DOCUMENT NUMBER-DATE

13396 NOV 30 88

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Easy Cellular, Inc.)	
d/b/a Telcom Plus against BellSouth)	
Telecommunications, Inc. for alleged)	Docket No. 980703-TP
violations of the Telecommunications)	Filed: November 30, 1998
Act of 1996 and Chapter 364 of the)	
Florida Statutes)	
<hr/>		

**NOTICE OF INTENT TO OBJECT TO BELLSOUTH'S FIRST
SET OF INTERROGATORIES AND FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS**

Easy Cellular, Inc. d/b/a Telcom Plus ("Easy Cellular") herewith files its Notice of Intent to Object to BellSouth's First Set of Interrogatories and First Request for Production of Documents, and would show:

1. On June 1, 1998, Easy Cellular filed a Complaint against BellSouth Telecommunications, Inc. ("BellSouth") for violations of the Telecommunications Act of 1996. On June 22, BellSouth filed its Answer and asserted a Counterclaim against Easy Cellular. The answer to the Counterclaim was filed July 28, 1998.

2. On November 20, 1998, BellSouth filed its First Set of Interrogatories and First Request for Production of Documents to Easy Cellular.

3. Easy Cellular generally objects to all of BellSouth's First Set of Interrogatories to the extent that it calls for specific account information that is both proprietary and confidential in nature, and that is both irrelevant and will not lead to admissible evidence in this proceeding. Easy Cellular specifically objects to Interrogatory 5 as being vague and ambiguous. Easy Cellular also objects to Interrogatories 6 and 7, as they request billing information readily available to BellSouth through BellSouth's own records, which would be unduly burdensome for Easy Cellular to provide.

DOCUMENT NUMBER - DATE

13396 NOV 30 88

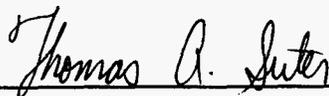
FPSC-RECORDS/REPORTING

4. Easy Cellular generally objects to BellSouth's First Request for Production of Documents to the extent that it calls for specific account information that is both proprietary and confidential in nature, that is both irrelevant and will not lead to admissible evidence in this case. Easy Cellular specifically objects to Request 2, as it calls for production of billing information readily available to BellSouth through BellSouth's own records, and would be unduly burdensome for Easy Cellular to produce. Easy Cellular specifically objects to Requests 3 and 6 as overbroad and as calling for documents readily available to BellSouth through BellSouth's own records, which would be unduly burdensome for Easy Cellular to provide. Easy Cellular specifically objects to Request 9 as vague, ambiguous, and overbroad.

5. Easy Cellular can and will answer BellSouth's First Set of Interrogatories and First Request for Production of Documents, to the extent that they are relevant and unobjectionable, within the applicable time limitations.

WHEREFORE, Easy Cellular herewith notices its intent to object to BellSouth's First Set of Interrogatories and First Request for Production of Documents.

Respectfully submitted.
MESSER, CAPARELLO & SELF, P.A.



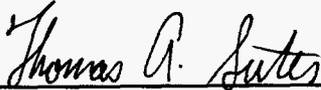
Norman H. Horton, Jr.
Thomas A. Suter
215 S. Monroe Street, Suite 701
P.O. Box 1876
Tallahassee, FL 32302-1876
(904) 222-0720
Attorneys for Easy Cellular, Inc. d/b/a Telcom Plus

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Easy Cellular's Notice of Intent to Object to BellSouth's First Set of Interrogatories and First Request for Production of Documents in Docket No. 980703-TP has been furnished by Hand Delivery (*) and/or U.S. Mail to the following parties of record this 30th day of November, 1998:

Beth Keating, Esq.*
Division of Legal Services
Room 370, Gunter Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Mary K. Keyer, Esq.
c/o Ms. Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301



Thomas A. Suter