

LAW OFFICES
MESSER, CAPARELLO & SELF
A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701
POST OFFICE BOX 1876
TALLAHASSEE, FLORIDA 32302-1876
TELEPHONE: (850) 222-0720
TELECOPIERS: (850) 224-4359; (850) 425-1942

ORIGINAL

RECEIVED-PPSC

DEC 15 PM 3:13

RECORDS AND
REPORTING

December 15, 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 one copy of the Notice of Service of Easy Cellular, Inc's First Set of Interrogatories and First Request for Production of Documents to BellSouth Telecommunications, Inc.

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

- AC ✓ _____
- AFA _____
- APP _____
- CAF _____
- CM _____
- CTI _____
- EAC _____
- LEE _____
- LW _____
- OP _____
- RC _____
- SEC _____
- WAS _____
- OTH _____

TAS/amb
Enclosures

cc: Glenn Richards, Esq.
Parties of Record

DOCUMENT NUMBER-DATE

14075 DEC 15 98

PPSC-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)
violations of the Telecommunications)
Act of 1996 and Chapter 364 of the)
Florida Statutes)
_____)

Docket No. 980703-TP
Filed: December 15, 1998

**NOTICE OF SERVICE OF EASY CELLULAR, INC.'S
FIRST SET OF INTERROGATORIES AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
BELLSOUTH TELECOMMUNICATIONS, INC.**

Easy Cellular, Inc. d/b/a Telcom Plus ("Easy Cellular"), by and through its undersigned counsel, hereby files and serves Notice that it has served its First Set of Interrogatories and its First Request for Production of Documents to BellSouth Telecommunications, Inc. by hand delivery on Mary K. Keyer, Esq. c/o Ms. Nancy Sims, BellSouth Telecommunications, Inc., 150 S. Monroe St., Suite 400, Tallahassee, Florida, 32301, on this 15th day of December, 1998.

Respectfully submitted,



NORMAN H. HORTON, JR., ESQ.
THOMAS A. SUTER, ESQ.
Messer, Caparello & Self, P.A.
P. O. Box 1876
Tallahassee, Florida 32302
(904) 222-0720

Attorneys for Easy Cellular, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Notice of Service of Easy Cellular, Inc.'s First Set of Interrogatories and First Request for Production of Documents to BellSouth Telecommunications, Inc. in Docket No. 980703-TP has been furnished by Hand Delivery (*) and/or U.S. Mail to the following parties of record this 15th day of December, 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