ORIGINAL

LAW OFFICES

MESSER, CAPARELLO & SELF RECEIVED FRSC

A PROFESSIONAL ASSOCIATION

ZIB SOUTH HOHROE STREET, SUITE 701
POST OFFICE BOX 1876
TALLAHASSEE, FLORIDA DEGOS-1876
TELEPHONE (850) 222-0720

TELECOPIERS (850) 224 4358, (850) 425-1842

99 JAN 15 PM 4: 40

RECUIRED AND REPORTING

January 15, 1999

BY HAND DELIVERY

Ms. Blanca Bayo, Director Division of Records and Reporting Room 110, Easley Building Florida Public Service Commission 25:0 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

> James C. Falvey, Esq. Parties of Record

Re: Docket No. 981745-TP

Dear Ms. Bayo:

SEC

WAS

Enclosed for filing on behalf of e.spire Communications, Inc. are the following documents:

- An original and one copy of the Notice of Service of e-spire Communications, Inc.'s
 First Set of Interrogatories and First Request for Production of Documents to BellSouth Telecommunications, Inc.;
- 2. An original and fifteen copies of e.spire Communications, Inc.'s Motion to Exceed Limits on Discovery; and

| ACK | 3. An original and fifteen copies of e.spire Communications, Inc.'s Motion to Shorten Time for Response. |
|------------|---|
| AFA APP | Please acknowledge receipt of these documents by stamping the extra copy of this letterfiled" and returning the same to me. |
| | Stavan Thank you for your assistance with this filing. |
| CTR | Sincerely, |
| EAG | RECEIVED & FILED |
| LEG | 3 Old Vorman Offren |
| LIN | 3 FPSC-DHEAU OF RECORDS Norman H. Horton, Jr. |
| OPC | THE OF RECORDS |
| RCH | NHH/amb - Enclosures |
| | |

DOCUMENT NUMBER-DATE

00635 JAN 15 &

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In re: Petition by e.spire Communications, Inc. and American Communication Services of) |) | |
|--|---|-------------------------|
| Tampa, Inc. and American Communication |) | Docket No. 981745-TP |
| Services of Jacksonville, Inc. for Arbitration |) | Filed: January 15, 1999 |
| of an Interconnection Agreement with BellSouth |) | |
| Telecommunications, Inc. pursuant to Section |) | |
| 252(b) of the Telecommunications Act of 1996 |) | |
| | | |

e.spire COMMUNICATIONS, INC.'S NOTICE OF SERVICE OF e.spire COMMUNICATIONS, INC.'S FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO BELLSOUTH TELECOMMUNICATIONS, INC.

e.spire Communications, Inc. 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 by hand delivery on Nancy White, Esq. c/o Ms. Nancy Sims, BellSouth

Telecommunications, Inc., 150 S. Monroe Street, Suite 400, Tallahassee, FL 32301, on this 15th day

of January, 1999.

Respectfully submitted,

WAS _

OTH _

| | 0 1111 5 |
|-----|--|
| ACK | Derman Altorbon |
| AF4 | NORMAN N. HORTON, JR. |
| 400 | FLOYD R. SELF |
| | Messer, Caparello & Self, P.A. |
| 01F | P. O. Box 1876 |
| CMU | Tallahassee, FL 32302-1876 |
| CTR | (850) 222-0720 |
| EAG | Attorneys for e.spire Communications, Inc. |
| LBG | Autorneys for e.spire Confindingations, inc. |
| LIN | |
| OPC | |
| RCH | |
| SEC | |

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of e.spire Communications, Inc.'s Notice of Service of e.spire Communications, Inc.'s First Set of Interrogatories and First Request for Production of Documents to BellSouth Telecommunications, Inc. have been served upon the following parties by Hand Delivery (*) and/or U. S. Mail this 15th day of January, 1999.

June McKinney, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Ms. Nancy White*
c/o Ms. Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301

Mary Jo Peed, Esq.
BellSouth Telecommunications, Inc.
675 West Peachtree Street, NE
Atlanta, GA 30375

Norman H. Horton, Jr.