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RECORDS 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
2500 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 981745-TP

Dear Ms. Bayo:

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

1. 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.; ~~00033-99~~
2. An original and fifteen copies of e.spire Communications, Inc.'s Motion to Exceed Limits on Discovery; and ~~00036-99~~
3. An original and fifteen copies of e.spire Communications, Inc.'s Motion to Shorten Time for Response. ~~00037-99~~

ACK _____

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

CAF _____
CMU *Stavans* Thank you for your assistance with this filing.

CTR _____

Sincerely,

EAG _____

RECEIVED & FILED

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PPSC BUREAU OF RECORDS

LIN 5 _____

Norman H. Horton, Jr.
Norman H. Horton, Jr.

OPC _____

RCH _____

SEC 1 _____

WAS _____

OTH _____

NHH/amb
Enclosures
cc: James C. Falvey, Esq.
Parties of Record

ORIGINAL

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)

MOTION TO EXCEED LIMITS ON DISCOVERY

Comes now American Communications Services, Inc. - Jacksonville, Inc., d/b/a e.spire™ Communications, Inc. ("e.spire"), and files this Motion to Shorten Time for Response. As basis e.spire would show:

1. By Order No. PSC-99-0090-PCO-TP issued January 14, 1999, the Prehearing Officer issued an Order on Consolidating Dockets for Hearing and Establishing Procedure establishing the dates for hearings, testimony and other procedural issues. With respect to discovery, the Prehearing Officer limited interrogatories to 100 including subparts and requests for production of documents to 75, including subparts. The order states that those limits may be subsequently modified.

2. On January 15, 1999, e.spire filed interrogatories and a request for production of documents, both of which exceed the limits when subparts are counted. Given the number and complexity of issues to be addressed in this docket the limits should be increased. Many of the issues address technical arrangements and/or offerings and the ability to examine responses with respect to these issues will facilitate the hearings and presentations of the parties.

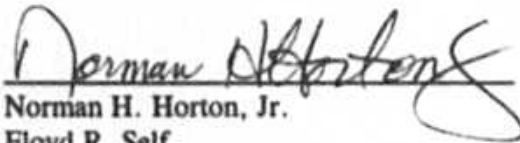
DOCUMENT NUMBER-DATE

00636 JAN 15 99

FPSC-RECORDS/REPORTING

Wherefore, e.spire requests that as to the discovery served by e.spire on January 15, 1999, the Prehearing Office waive the limits of the procedural order and as to the limits generally, e.spire requests that they be increased.

Respectfully submitted,



Norman H. Horton, Jr.

Floyd R. Self

Messer, Caparello & Self, P.A.

215 S. Monroe Street, Suite 701

P.O. Box 1876

Tallahassee, FL 32302-1876

(850) 222-0720

Attorneys for e.spire Communications, Inc.

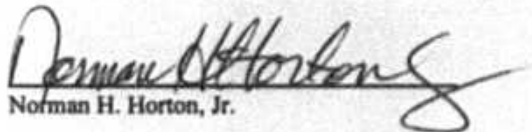
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of e.spire Communications, Inc.'s Motion to Exceed Limits on Discovery 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.