

ORIGINAL

LAW OFFICES
MESSER, CAPARELLO & SELF
A PROFESSIONAL ASSOCIATION

RECEIVED-PPSC

218 SOUTH MONROE STREET, SUITE 701
POST OFFICE BOX 1876
TALLAHASSEE, FLORIDA 32302-1876
TELEPHONE: (850) 222-0720
TELECOPIERS: (850) 224-4358; (850) 423-1842

99 JAN 15 PM 4:40

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

LEG 3 _____

PPSC BUREAU OF RECORDS

LIN 5 _____

Norman H. Horton, Jr.

OPC _____

NHH/amb

RCH _____

Enclosures

SEC 1 _____

cc: James C. Falvey, Esq.

WAS _____

Parties of Record

OTH _____

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)
Services of Jacksonville, Inc. for Arbitration)
of an Interconnection Agreement with BellSouth)
Telecommunications, Inc. pursuant to Section)
252(b) of the Telecommunications Act of 1996)

Docket No. 981745-TP
Filed: January 15, 1999

MOTION TO SHORTEN TIME FOR RESPONSE

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. On January 15, 1999 e.spire served discovery on BellSouth Telecommunications, Inc. in this docket consisting of both Interrogatories and a Request for Production of Documents. Pursuant to Rule 28-106-206, Florida Administrative Code, and Rules 1.340 and 1.350, Rules of Civil Procedure, responses are due within 30 days after service, but a shorter time may be allowed.

2. Hearings in this docket are scheduled to begin March 18, 1999, with rebuttal testimony due February 19, 1999. The information sought by the interrogatories and production of documents will need to be reviewed to prepare rebuttal testimony and prepare for the hearings. Given the schedule for this case it would be appropriate to shorten the time for responses to 20 days.

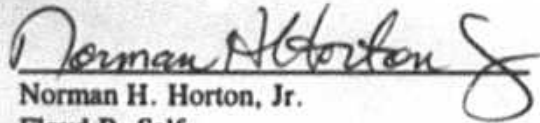
DOCUMENT NUMBER-DATE

~~00637~~ JAN 15 99

FPSC-RECORDS/REPORTING

Wherefore, e.spire requests that the time to respond to interrogatories and produce the requested documents be shortened to 20 days.

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.

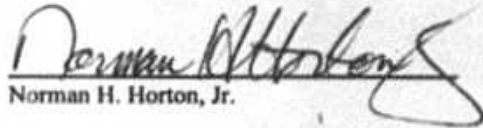
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of e.spire Communications, Inc.'s Motion to Shorten Time for Response 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.