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January 21, 1999

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 981652-TP and 981745-TP

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Response to Motions to Shorten Time for Response and to Exceed Limits on Discovery. Please file this document in the above-captioned dockets.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White (cc)
Nancy B. White

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Enclosures

cc: All parties of record
Marshall M. Criser III
William J. Ellenberg II

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FPSC-BUREAU OF RECORDS AND REPORTING

CERTIFICATE OF SERVICE
Docket Nos. 981642-TP and 981745-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by

Federal Express this 21st day of January, 1999 to the following:

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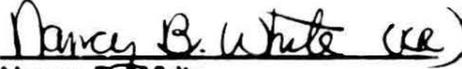
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Nancy B. White

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: **Petition by Intermedia Communications Inc.**)
for Arbitration with BellSouth Telecommunications,) **Docket No. 981642-TP**
Inc., Pursuant to the Telecommunications Act of 1996)

In re: **Petition by e.spire Communications, Inc.**)
And American Communication Services of Tampa,)
Inc., American Communications Services of)
Jacksonville, Inc. for Arbitration of an) **Docket No. 981745-TP**
Interconnection Agreement with BellSouth)
Telecommunications, Inc. Pursuant to Section 252(b))
Of the Telecommunications Act of 1996)

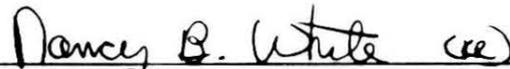
BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE
TO MOTIONS TO SHORTEN TIME FOR RESPONSE AND TO
EXCEED LIMITS ON DISCOVERY

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits its response to the Motion to Shorten Time for Response and Motion to Exceed Limits on Discovery filed by American Communications Services, Inc.-- Jacksonville, Inc. d/b/a e.spire Communications, Inc., ("e.spire"). While not opposing these motions, BellSouth submits they should only be granted on the following basis. First, the time for responding to discovery and the limits on discovery should be uniform among the parties. For example, BellSouth should not be given only 20 days to respond to e.spire's discovery, while e.spire has 30 days to respond to BellSouth's discovery requests. Accordingly, to the extent the Commission is inclined to grant e.spire's motions, all parties should be relieved from the limits on discovery imposed by the prehearing officer and should be required to respond to discovery requests in the same amount of time.

Second, while BellSouth agrees that many of the issues in this case are complex and that the parties should have some flexibility in serving written discovery, e.spire's first set of interrogatories to BellSouth consist of approximately 200 questions, including subparts. This is almost twice the number permitted by the prehearing officer. While BellSouth is prepared to answer e.spire's discovery requests (subject to applicable objections), the parties should be required to seek leave of the Commission to serve any additional written discovery beyond their first set of interrogatories and requests for production. Such an approach would balance each party's need for information while protecting the parties from having to respond to lengthy and burdensome written discovery requests.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

 (re)

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