

LAW OFFICES
MESSER, CAPARELLO & SELF
A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET SUITE 70-
POST OFFICE BOX 1076
TALLAHASSEE, FLORIDA 32302-1076
TELEPHONE (904) 222-0720
TELECOPIERS (904) 224-4350 (904) 475-1042

ORIGINAL

RECEIVED PSC

JUL 15 PM 3:44

RECORDS AND
REPORTING

July 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~~

980696
146

Dear Ms. Bayo:

Enclosed for filing in the captioned docket is an original and one copy of the following documents:

1. e.spire's™ Notice of Service of its First Request for Production of Documents to Sprint-Florida, Inc.; 07433-98
2. e.spire's™ Notice of Service of its First Request for Production of Documents to GTE Florida, Incorporated; and 07464-98
3. e.spire's™ Notice of Service of its First Request for Production of Documents to BellSouth Telecommunications, Inc. 07463-98

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.

RECEIVED & FILED

Sincerely,

FPSC BUREAU OF RECORDS

Norman H. Horton, Jr.

NHH/amb
Enclosures

cc: James C. Falvey, Esq.
Parties of Record

07433 JUL 15 1998

07433 JUL 15 1998

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Determination of Cost of Basic Local
Telecommunications Services)
_____)

Docket No. 980696-TP
Filed: July 15, 1998

**e.spire's™ NOTICE OF SERVICE OF
e.spire's™ FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS TO BELL SOUTH TELECOMMUNICATIONS, INC.**

American Communications Services, Inc. - Jacksonville, Inc., d/b/a e.spire™
Communications, Inc. ("e.spire™"), by and through its undersigned counsel, hereby files and serves
Notice that it has served its First Request for Production of Documents to BellSouth
Telecommunications, Inc. by U. S. Mail on Nancy White, Esq. c/o Ms. Nancy Sims, BellSouth
Telecommunications, Inc., 150 S. Monroe St., Suite 400, Tallahassee, Florida, 32301, on this 15th
day of July, 1998.

Respectfully submitted,



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

Attorneys for e.spire™ Communications, Inc.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH _____

DOCUMENTS HAVE BEEN UPDATED
07463 JUL 15 98

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of e.spire's™ Notice of Service of e.spire's™ First Request for Production of Documents to BellSouth Telecommunications, Inc. in Docket No 980696-TP has been furnished by Hand Delivery (*) and/or U.S. Mail to the following parties of record this 15th day of July, 1998:

Nancy White, Esq.
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

Patrick K. Wiggins, Esq.
Donna Canzano, Esq.
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, FL 32302

Kenneth A. Hoffman, Esq.
John Ellis, Esq.
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
Post Office Box 551
Tallahassee, FL 32302-0551

Richard Melson, Esq.
Hopping, Green, Sams & Smith
Post Office Box 6526
Tallahassee, FL 32314

Jack Shreve, Esq.
Charles Beck, Esq.
Earl Poucher
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Rm 812
Tallahassee, FL 32399-1400

Michael Gross, Assistant Attorney General
Office of Attorney General
PL-01 The Capitol
Tallahassee, FL 32399-1050

Rhonda Merritt, Asst. Vice President
Tracy Hatch, Esq.
AT&T
101 N. Monroe Street, Suite 700
Tallahassee, FL 32301

Monica Barone, Esq.
Sprint
3100 Cumberland Circle
Atlanta, GA 30339

Charles Rehwinkel
Sprint-Florida
1313 Blair Stone Road, MC FLTH00107
Tallahassee, FL 32301

Joseph McGlothlin, Esq.
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 S. Gadsden Street
Tallahassee, FL 32301

John Fons, Esq.
Jeff Whalen, Esq.
Ausley & McMullen
227 S. Calhoun Street
Tallahassee, FL 32301

David B. Erwin, Esq.
Attorney-at-Law
127 Riversink Road
Crawfordville, FL 32327

Kimberly Caswell, Esq.
GTE Florida Incorporated
Post Office Box 110, FLTC0007
Tampa, FL 33601

Mr. David Swafford
Marc Dunbar, Esq.
Pennington, Moore, Wilkinson,
& Dunbar, P.A.
Post Office Box 10095
Tallahassee, FL 32302

Mr. Tom McCabe
TDS Telecom
Post Office Box 189
Quincy, FL 32353-0189

Mr. Ben Ochshorn
Florida Legal Services
2121 Delta Boulevard
Tallahassee, FL 32303

Frankie Callen
Vice President of Governmental Affairs
The Greater Orlando Assoc. of REALTORS
Post Office Box 587
Orlando, FL 32802-0587

Kelly Goodnight
Frontier Communications
180 S. Clinton Avenue
Rochester, NY 14646

Mr. Mike Lacour
GTC Inc.
Post Office Box 220
Port St. Joe, FL 32457

Mr. Ed Paschall
AARP
1923 Atapha Nene
Tallahassee, FL 32301-5850

Laura Gallagher, Esq.
Florida Cable Telecommunications Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

Debra K. Mink, R.P.A., President
Legislative Chair, BOMA Florida
Mink & Mink, Inc.
Sunnyvale Building
3081 East Commercial Boulevard
Fort Lauderdale, FL 33308

Mr. Bill Thomas
GTC, Inc.
Post Office Box 220
Port St. Joe, FL 32457

Mr. Mark Ellmer
GTC, Inc.
Post Office Box 220
Port St. Joe, FL 32457

Ms. Susan Langston
FTIA
Post Office Box 1776
Tallahassee, FL 32302-1776

Mr. Bill Huttenhower
Vista-United
Post Office Box 10180
Lake Buena Vista, FL 32830

Mr. Jim McGinn
ITS Telecommunications Systems, Inc.
Post Office Box 277
Indiantown, FL 34956

Mr. Gene Adams
Florida Association of Realtors
Post Office Box 1853
Tallahassee, FL 32302-1853

Chris Keena
Property Operations Manager
Compass Management & Leasing, Inc.
1801 Hermitage Boulevard, Suite 130
Tallahassee, FL 32308

Mr. Mike Loconto
Smith, Bryan & Myers
311 E. Park Avenue
Tallahassee, FL 32301

Mr. Steve Brown
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309

Ms. Harriet Eudy
ALLTEL
206 White Drive
Live Oak, FL 32060

Ms. Lynne G. Brewer
Northeast Florida Telephone Company
Post Office Box 485
Macclenny, FL 32063

Mr. John L. Brewerton, III, P.A.
250 N. Orange Avenue, Suite 1700
Orlando, FL 32801


Norman H. Horton, Jr.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of e.spire's™ Notice of Service of e.spire's™ First Request for Production of Documents to GTE Florida, Incorporated in Docket No 980696-TP has been furnished by Hand Delivery (*) and/or U.S. Mail to the following parties of record this 15th day of July, 1998.

Nancy White, Esq.
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

Patrick K. Wiggins, Esq.
Donna Canzano, Esq.
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, FL 32302

Kenneth A. Hoffman, Esq.
John Ellis, Esq.
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
Post Office Box 551
Tallahassee, FL 32302-0551

Richard Melson, Esq.
Hopping, Green, Sams & Smith
Post Office Box 6526
Tallahassee, FL 32314

Jack Shreve, Esq.
Charles Beck, Esq.
Earl Poucher
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Rm 812
Tallahassee, FL 32399-1400

Michael Gross, Assistant Attorney General
Office of Attorney General
PL-01 The Capitol
Tallahassee, FL 32399-1050

Rhonda Merritt, Asst. Vice President
Tracy Hatch, Esq.
AT&T
101 N. Monroe Street, Suite 700
Tallahassee, FL 32301

Monica Barone, Esq.
Sprint
3100 Cumberland Circle
Atlanta, GA 30339

Charles Rehwinkel
Sprint-Florida
1313 Blair Stone Road, MC FLTH00107
Tallahassee, FL 32301

Joseph McGlothlin, Esq.
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 S. Gadsden Street
Tallahassee, FL 32301

John Fons, Esq.
Jeff Whalen, Esq.
Ausley & McMullen
227 S. Calhoun Street
Tallahassee, FL 32301

David B. Erwin, Esq.
Attorney -at-Law
127 Riversink Road
Crawfordville, FL 32327

Kimberly Caswell, Esq.
GTE Florida Incorporated
Post Office Box 110, FLTC0007
Tampa, FL 33601

Mr. David Swafford
Marc Dunbar, Esq.
Pennington, Moore, Wilkinson,
& Dunbar, P.A.
Post Office Box 10095
Tallahassee, FL 32302

Mr. Tom McCabe
TDS Telecom
Post Office Box 189
Quincy, FL 32353-0189

Mr. Ben Ochshorn
Florida Legal Services
2121 Delta Boulevard
Tallahassee, FL 32303

Frankie Callen
Vice President of Governmental Affairs
The Greater Orlando Assoc. of REALTORS
Post Office Box 587
Orlando, FL 32802-0587

Kelly Goodnight
Frontier Communications
180 S. Clinton Avenue
Rochester, NY 14646

Mr. Mike Lacour
GTC Inc.
Post Office Box 220
Port St. Joe, FL 32457

Mr. Ed Paschall
AARP
1923 Atapha Nene
Tallahassee, FL 32301-5850

Laura Gallagher, Esq.
Florida Cable Telecommunications Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

Debra K. Mink, R.P.A., President
Legislative Chair, BOMA Florida
Mink & Mink, Inc.
Sunnyvale Building
3081 East Commercial Boulevard
Fort Lauderdale, FL 33308

Mr. Bill Thomas
GTC, Inc.
Post Office Box 220
Port St. Joe, FL 32457

Mr. Mark Ellmer
GTC, Inc.
Post Office Box 220
Port St. Joe, FL 32457

Ms. Susan Langston
FTIA
Post Office Box 1776
Tallahassee, FL 32302-1776

Mr. Bill Huttenhower
Vista-United
Post Office Box 10180
Lake Buena Vista, FL 32830

Mr. Jim McGinn
ITS Telecommunications Systems, Inc.
Post Office Box 277
Indiantown, FL 34956

Mr. Gene Adams
Florida Association of Realtors
Post Office Box 1853
Tallahassee, FL 32302-1853

Chris Keena
Property Operations Manager
Compass Management & Leasing, Inc.
1801 Hermitage Boulevard, Suite 130
Tallahassee, FL 32308

Mr. Mike Loconto
Smith, Bryan & Myers
311 E. Park Avenue
Tallahassee, FL 32301

Mr. Steve Brown
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309

Ms. Harriet Eudy
ALLTEL
206 White Drive
Live Oak, FL 32060

Ms. Lynne G. Brewer
Northeast Florida Telephone Company
Post Office Box 485
Macclenny, FL 32063

Mr. John L. Brewerton, III, P.A.
250 N. Orange Avenue, Suite 1700
Orlando, FL 32801


Norman H. Horton, Jr.