

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE (202) 424-7647

ORIGINAL
RECORDS
MAY 17 10 25
NEW YORK OFFICE
LEXINGTON AVENUE
NEW YORK, NY 10017-4874

May 16, 2001

VIA FEDERAL EXPRESS

Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

**Re: Docket No. 960786-TL
Consideration of BellSouth Telecommunications, Inc.'s
entry into interLATA services pursuant to Section 271
of the Federal Telecommunications Act of 1996.**

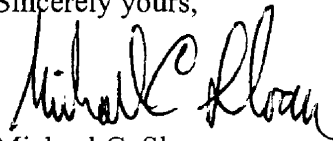
MAY 17 10 59

Dear Ms. Bayo:

Enclosed is an original and seven copies of Florida Digital Network Incorporated's Notice of Filing Interrogatories and Request for Production of Documents in the above captioned proceeding. As indicated in the attached Notice, the actual interrogatories and document requests have been served on BellSouth's counsel, the parties of record and Commission staff.. We ask that you file this pleading in the above-captioned docket.

An extra copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Please feel free to contact me on 202-295-8458 if you have any questions or require further information.

Sincerely yours,



Michael C. Sloan
Counsel for the Florida Digital Network, Inc.

- APP
- CAF
- OMP
- COM
- CTR
- ECR
- LEG
- OPC
- PAI
- RGO
- SEC
- SER
- OTH

Enclosure

cc: All Parties of Record
Matthew Feil

RECORDED
MAY 17 2001
RECORDS

DOCUMENT NUMBER-DATE
06174 MAY 17 2001
FPSC-RECORDS/REPORTING

07/12/01

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth)
Telecommunications, Inc.'s entry into) Docket No. 960786-TL
InterLATA services pursuant to Section)
271 of the Federal Telecommunications)
Act of 1996)

NOTICE OF FLORIDA DIGITAL NETWORK, INC.
OF FILING FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
AND FIRST SET OF INTERROGATORIES

Through undersigned counsel, Florida Digital Network, Inc. ("FDN"), hereby provides notice to the Florida Public Service Commission that on this 7th day of May, 2001, it is serving on BellSouth Telecommunications, Inc. ("BellSouth") and the parties in this proceeding FDN's First Request for Production of Documents and First Set of Interrogatories.

DOCUMENT NUMBER-DATE

06174 MAY 17 2001

FDSC-25000000/050007100

Respectfully submitted,

Florida Digital Network, Inc.

By: _____

Eric J. Branfman
Michael C. Sloan
Paul B. Hudson
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, DC 20007
Tel: 202/424-7500
Fax: 202/424-7645
e-mail: mcsloan@swidlaw.com

and

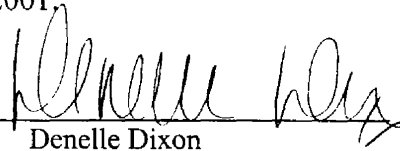
Matthew Feil
Florida Digital Network, Inc.
390 North Orange Ave.
Suite 2000
Orlando, FL 32801
(407) 835-0460
mfeil@floridadigital.net

Its Attorneys

Dated: May 16, 2001

CERTIFICATE OF SERVICE
DOCKET NO. 960786-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via U.S. Mail
to the parties of record listed below on this the 16th day of May 2001:


Denelle Dixon

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth)
Telecommunications, Inc.'s entry into) Docket No. 960786-TL
InterLATA services pursuant to Section)
271 of the Federal Telecommunications)
Act of 1996)

SERVICE LIST

James Falvey
American Communications Services, Inc.
131 National Business Parkway
Annapolis Junction, MD 20701
Represented by: Messer Law Firm

Ms. Rhonda P. Merritt
AT&T Communication of the Southern States, Inc.
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549
hone: (850) 425-6342
Fax: 425-6361

Ms. Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556
Phone: (850) 224-7798
Fax: 222-8640

Nancy White
BellSouth Telecommunications, Inc. (Atl)
675 W. Peachtree St., #4300
Atlanta, GA 30375
Phone: 404-335-0710
Fax: 404-614-4054

Ms. Rose M. Mulvany
Birch
2020 Baltimore Avenue
Kansas City, MO 64108-1914
Phone: (816) 300-3731
Fax: (816) 300-3350
rmulvany@birch.com

Genevieve Morelli
CompTel
1900 M Street, NW, Suite 800
Washington, DC 20036

Donald Crosby
Continental Cablevision
7800 Belfort Parkway, #270
Jacksonville, FL 32256-6925
Phone: 904-731-8810
Fax: 904-281-0342

Jill Butler
Cox Communications (VA)
585 Village Ave.
Norfolk, VA 23502
Phone: 757-369-4524
Fax: 757-369-4500
Represented by: Landers Law Firm

Alan H. Keith
CWA
2180 West State Road 434, Suite 1168
Orange Park, FL 32779
Phone: 407-772-0266
Fax: 407-772-2516

Kenneth Ruth
CWA (Orl)
2180 West State Road 434
Longwood, FL 32779
Phone: 407-772-0266
Fax: 407-772-2516

Lisa Bilchik
Davel Communications Group, Inc.
10120 Windhorst Rd.
Tampa, FL 33619
Phone: 813-628-8000
Fax: 813-740-9406

Nanette Edwards
DeltaCom, Inc.
700 Boulevard South # 101
Huntsville, AL 35802

Linda Williams
DES Long Distance
P. O. Box 1585
Destin, FL 32540-1585
Phone: (850) 837-0077
Fax: (850) 654-1794

Everett Boyd
Ervin Law Firm
P.O. Drawer 1170
Tallahassee, FL 32302
Phone: 850-224-9135
Fax: 222-9164
Represents: Sprint/Sprint-Metro

Michael Gross/Charles Dudley
Florida Cable Telecommunications Assoc., Inc.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303
Phone: 850-681-1990
Fax: 681-9676
mgross@fcta.com

Vicki Kaufman
c/o McWhirter Law Firm
Florida Competitive Carriers Assoc.
117 S. Gadsden St.
Tallahassee, FL 32301
Phone: 850-222-2525
Fax: 222-5606

Michelle Hershel
Florida Electric Cooperatives Association, Inc.
P.O. Box 590
Tallahassee, FL 32302
Phone: 850-877-6166
Fax: 656-5485

Director of Regulatory Affairs
IXC Communications Services, Inc.
1122 Capital of Texas Highway
SouthAustin, TX 78746
Phone: (512) 340-2665
Fax: (512) 328-7902

Charles Pellegrini/Patrick Wiggins
Katz, Kutter Law Firm
12th Floor 106 East College Avenue
Tallahassee, FL 32301
Phone: 850-224-9634
Fax: 222-0103
Represents: Intermedia

Richard Melson
Hopping Green Sans and Smith Law Firm
P.O. Box 6526
Tallahassee, FL 32314
Phone: 850-222-7500
Fax: 224-8551
Represents: MCI, Rhythms Links,
ITC^DeltaCom

Mr. Scott Sapperstein
Intermedia Communications, Inc.
One Intermedia Way (MC FLT -HQ3)
Tampa, FL 33647-1752
Phone: (813) 829-4093
Fax: (813) 829-4923
sasapperstein@intermedia.com
Represented by: Katz, Kutter Law Firm

Brian Sulmonetti
LDDS Communications, Inc.
1515 S. Federal Hwy., #400
Boca Raton, FL 33432-7404
Phone: 561-750-2940
Fax: 561-750-2629
Represented by: Messer Law Firm

Ms. Donna C. McNulty
MCI WorldCom Network Services, I
325 John Knox Road, Suite 105
Tallahassee, FL 32303-4131
Phone: 850-422-1254
Fax: 422-2586
donna.mculty@wcom.com

Floyd Self
Messer Law Firm
P.O. Box 1876
Tallahassee, FL 32302
Phone: 850-222-0720
Fax: 224-4359

Marilyn H. Ash
MGC Communications, Inc.
3301 North Buffalo Drive
Las Vegas, NV 89129
Phone: 702-310-8461
Fax: 702-310-5689

Network Access Solutions Corporation
100 Carpenter Drive, Suite 206
Sterling, VA 20164
Phone: (703) 742-7700
Fax: (703) 742-7706
Represented by: Shook, Hardy & Bacon LLP

Peter Dunbar/Karen Camechis
Pennington Law Firm
P.O. Box 10095
Tallahassee, FL 32301
Phone: 850-222-3533
Fax: 222-2126
pete@penningtonlawfirm.com

Charlene Perry
Touch 1 Communications
P.O. Drawer 10751
Atmore, AL 36504-5751
Phone: 334-368-8600
Fax: 334-368-1314

TransAmerica Communications, Inc.
% Qwest
4250 North Fairfax Drive, 12W002
Arlington, VA 22203
Phone: (703) 363-4321
Fax: (703) 363-4404

Represents: Time Warner

Rodney L. Joyce
Shook, Hardy & Bacon LLP
600 14th Street, N.W., Suite 800
Washington, DC 20005-2004
Phone: (202) 639-5602
Fax: (202) 783-4211
rjoyce@shb.com

Mr. Benjamin W. Fincher
Sprint/Sprint-Metro
3100 Cumberland Circle, #802
Atlanta, GA 30339
Phone: 404-649-5144
Fax: 404-649-5174
Represented by: Ervin Law Firm

Ms. Carolyn Marek
Time Warner Telecom
Regulatory Affairs, Southeast Region
233 Bramerton Court
Franklin, TN 37069
Phone: (615) 376-6404
Fax: (615) 376-6405
carolyn.marek@twtelecom.com
Represented by: Pennington Law Firm

U.S. Department of Justice/Telecom Task Force
Anu SeamAntitrust Division
1401 H Street N.W., Ste 8000
Washington, DC 20530
Phone: 202-514-9848
Fax: 202-514-6381

Matthew Feil
Florida Digital Network
390 N. Orange Avenue
Suite 2000
Orlando, FL 32801