

T. Michael Twomey  
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August 31, 2001

Mrs. Blanca S. Bayó  
Director, Division of the Commission  
Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

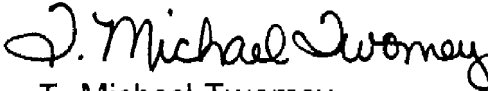
Re: Docket No. 001305-TP (Supra-BellSouth Arbitration)

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Opposition to Supra Telecommunications and Information Systems, Inc.'s Motion to Compel Responses to Request for Production of Documents and for Continuance, which we ask that you file in the above-referenced matter.

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,

  
T. Michael Twomey  
(2A)

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

DOCUMENT NUMBER-DATE

10895 AUG 31 8

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
Docket No. 001305-TP**

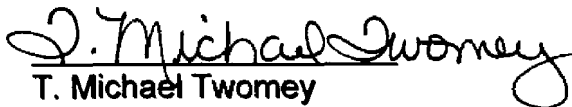
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Facsimile\* and/or Federal Express this 31<sup>st</sup> day of August, 2001 to the following:

Wayne Knight  
Staff Counsel  
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Florida Public Service Commission  
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1311 Executive Center Drive  
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Suite 200  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
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T. Michael Twomey

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Arbitration of the Interconnection )	
Agreement Between BellSouth Telecommunications, )	Docket No. 001305-TP
Inc. and Supra Telecommunications & Information )	
System, Inc., Pursuant to Section 252(b) of the )	Filed: August 31, 2001
Telecommunications Act of 1996. )	
_____ )	

**BELLSOUTH'S OPPOSITION TO SUPRA'S MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS AND FOR CONTINUANCE**

BellSouth Telecommunications, Inc. ("BellSouth") submits its Opposition to Supra Telecommunications & Information Systems, Inc.'s ("Supra") motion to compel production of documents and for a continuance of the hearing scheduled for September 26-28, 2001. For the reasons discussed in detail below, the Florida Public Service Commission ("Commission") should deny Supra's motion.

**BACKGROUND**

In the Supplemental Order Establishing Procedure (PSC-01-1475-PCO-TP), dated July 13, 2001, the Commission identified the issues that are the subject of this docket and otherwise reaffirmed the procedural schedule and rules that govern this proceeding as set forth in the initial Order Establishing Procedure (Order No. PSC-01-1401-PCO-TP), issued on June 28, 2001.

On August 6, 2001, Supra claims it served BellSouth with its Second Request for Production of Documents ("Second Request"). In fact, BellSouth did not receive a copy of the Second Request until August 20, 2001, by fax. BellSouth timely filed its objections to the Second Request on August 23, 2001. These objections were appropriate and well-founded and consisted of general objections as well as specific objections to

certain Requests. Supra's motion to compel further response to the Second Request is without merit and should be denied.

### DISCUSSION

Supra's Motion seeks to compel responses and to obtain a continuance of the hearing in this matter. The motion is ill-founded because BellSouth's objections were both appropriate and timely. A more detailed discussion of the motion to compel is set forth below, but it is appropriate to first address Supra's request for a continuance.

Throughout this proceeding, Supra has repeatedly attempted to delay the approval of a new interconnection agreement between the parties through various tactics, including refusing to negotiate in good faith, failing to cooperate with the Commission's staff, and moving to dismiss the proceeding. The request for a continuance is just the latest delay tactic designed to postpone the day when Supra and BellSouth will be operating under a new interconnection agreement approved by this Commission. As set forth below, Supra's motion is entirely without merit and provides no basis for the Commission to postpone the hearing. By submitting improper discovery requests on the eve of the discovery deadline in this case, it is obvious that Supra hoped to provoke objections from BellSouth that Supra could, in turn, attempt to use as a basis for a continuance. The Commission should not reward Supra's delay tactics. The objections should be sustained and the hearing should proceed as scheduled.

#### **I. BELLSOUTH'S OBJECTIONS WERE TIMELY.**

Supra claims that it served BellSouth with the Second Request on August 6, 2001. As noted, BellSouth did not receive the Second Request until August 20, 2001. On that day, after review of Supra's Notice of Filing Second Request for Production of Documents (filed August 13 with the Commission), undersigned counsel inquired of

Supra's counsel whether a Second Request had, in fact, been served. A representative of Supra stated that the discovery had been issued and provided a faxed copy to BellSouth's counsel. BellSouth filed its objections three days later. Therefore, there is no dispute that BellSouth's objections were timely based on the actual receipt of the Second Request.

In an effort to disprove BellSouth's claim that it did not receive a copy of the Second Set earlier than August 20, 2001, Supra attached to its motion a letter from FedEx to Mr. Gonzales, an employee of Supra. This letter does not prove that BellSouth received the Second Set (although it suggests that Supra may be using the FedEx account number assigned to Cisco Systems, Inc. because the shipper is indicated as Cisco, not Supra). The letter indicates that Mr. Chaiken sent an overnight delivery to undersigned counsel on August 7, 2001 that was received on August 8, 2001. The certificate of service attached to the Second Set certifies that R. Douglas Lackey and J. Philip Carver of BellSouth was served by overnight delivery on August 6, 2001. See Certificate of Service, Supra's Second Request for Production of Documents attached as Exhibit "A." Therefore, those attorneys for BellSouth should have received the Second Request on August 7, 2001.

As the Commission is well-aware, BellSouth and Supra are involved in several litigation matters at this time. Undersigned counsel routinely receives FedEx packages from Supra. In short, the letter shows only that Supra sent a FedEx delivery to T. Michael Twomey on August 7 for delivery on August 8, but it does not show what documents were included in the shipment. Based on the certificate of service executed by Supra's counsel, BellSouth could not have received the Second Set on August 8,

because the Second Set was supposedly sent on August 6 for delivery on August 7. Moreover, the discrepancies in the addressees listed in the certificate of service compared to the addressee on the FedEx letter casts further doubt on whether the FedEx letter relates to the Second Request at all.

## **II. BELLSOUTH'S OBJECTIONS WERE APPROPRIATE.**

Without reaching the issue of timeliness, the Commission can dispose of Supra's motion to compel. In the Order Establishing Procedure, the Commission established reasonable limits on the parties' rights to conduct discovery. Among other limitations, the Commission stated that "requests for production of documents, including all subparts, shall be limited to 150." Order PSC-01-1401-PCO-TP at p. 2. Neither party was permitted to submit requests in excess of 150, including subparts, in this proceeding. Supra's First Request for Production of Documents dated January 18, 2001 ("First Request") included more than 150 requests, including subparts. Supra does not dispute this fact in its motion.

Instead, Supra suggests that the limitation does not apply to any discovery issued before the Order Establishing Procedure. That argument suggests that any party may issue unlimited discovery in any Commission case so long as the party serves the discovery before the Commission has an opportunity to release its standard procedural order. Obviously, the Commission – not the parties – controls the conduct of discovery in the proceedings before it. The reasonable limit on requests included in the procedural order is the same type of limitation the Commission issues in all cases such as this one and the parties are bound by the procedural order.

Significantly, Supra was entitled to request that the Prehearing Officer permit Supra to submit additional requests, but Supra elected not to do so. The Commission's limit on discovery bars additional, unauthorized, discovery and BellSouth was not obliged to submit any objection to the improper requests. That is, BellSouth did not waive its rights to refuse to answer the improper additional requests irrespective of whether the objections were submitted in a timely manner.

#### Specific Objections

If all of the requests included in the Second Request were new requests, then the reasonable limit on discovery discussed above would dispose of all of the requests. After a careful review and comparison of the items in the Second Request with the items in the First Request, undersigned counsel concluded that certain items in the Second Request (Nos. 7, 12, 13, 14, and 16) are the same, or substantially the same, as certain items included in the First Request. Therefore, BellSouth addressed those items separately because, arguably, those items were within the limits imposed by the Commission.

For example, Item No. 12 of the Second Request and Item No. 18 of the First Request are identical in their request that BellSouth produce "[a]ll documents which evidence or reflect BellSouth's policies and procedures regarding Supra's PONs which sit in clarification and/or pending status for 10 days or more." Similarly, Item Nos. 13, 14, and 16 of the Second Request are identical to Item Nos. 20, 23, and 24, respectively, of the First Request. Moreover, Item No. 7 of the Second Request seeks the same information that Supra collectively requested in Item Nos. 9 and 21 of the First Request. BellSouth submitted specific objections to the corresponding items in the First Request on February 22, 2001. See BellSouth's Response and Objections to Supra's First

Request for Production of Documents, at ¶¶ 11-17. In the more than six months that have elapsed since BellSouth filed and served those objections, Supra never moved to compel responses to the First Request or otherwise challenged BellSouth's specific objections. The appropriate response to an objection is to challenge the objection before the Commission, not to simply ask the question again. Supra has not challenged BellSouth's prior specific objections in its motion.

Instead, Supra claims that it is "unsure" about BellSouth's objections and that the specific items in the First and Second Request "are not the same." BellSouth suggests that Supra review its own earlier requests to see that the items are "the same" and review BellSouth's earlier objections to those items to gain any clarity about the basis for BellSouth's objections.

Out of an abundance of caution, BellSouth also submitted specific objections to certain requests that were plainly in excess of the Commission's reasonable limits.

In Item 2, Supra requested an enormous amount of information relating to every central office in the State of Florida. This request is overly broad and unduly burdensome. Moreover, the item does not seek information relevant to the issues in this proceeding. The various issues to which Supra claims the item relates all concern BellSouth's ordering systems. Item 2 does not request information about the ordering systems. Supra does not pretend otherwise. While offering lip service to some general interest in parity, Supra claims that it needs the documents to "allow Supra to know the capabilities of every BellSouth central office and allow Supra to collocate equipment ...." Moreover, Supra claims the documents are necessary to "know what facilities and equipment are available in those central offices to not only serve its customers



appropriately, but also to design new-innovative products for those customers.” However sincere Supra’s desire for information may be, the request simply does not relate to any issue in this proceeding. Even if it did, the documents requested would fill several large rooms. The production of these documents alone would take weeks, perhaps months, to complete. Because Supra cannot show any legitimate need for the information contained in those documents, the objection should be sustained.

Items 5, 6, 8, 10, 15, 17, and 18 each seek irrelevant documents. For example, Item 5 seeks documents related to any “win back” programs. This docket does not include any issues related to BellSouth’s “win back” or other marketing programs.

The documents sought in item 6 (meeting minutes for the UNE-P project team) also are irrelevant to the issues in this proceeding. Supra claims: “Supra needs to have all relevant information about the UNE-P project team, some Follow-On Agreement. [sic]” This incomplete sentence sheds no light on the basis for Supra’s claim of relevance, but undersigned counsel assumes that Supra was attempting to articulate a concern relative to BellSouth’s performance of its obligations under its contracts, given the reference to testimony filed in the IDS docket. Once again, this docket concerns the terms and conditions that will be included in the parties new interconnection agreement. This is not a case in which the Commission will adjudicate disputes arising out of BellSouth’s or Supra’s performance (or not) of obligations under the parties’ prior agreement.

Item 8 seeks documents showing the relationship between BellSouth Telecommunications, Inc. and BellSouth Long Distance throughout the southeastern United States. This docket includes not a single issue to which documents on that topic

would be relevant. Supra merely repeats its stock “parity” claim as the basis for this request, with no explanation for how such documents could possibly relate to any of the issues in this proceeding.

Item 10 seeks “performance reports, including employee evaluations” relating to the Local Carrier Service Center (“LCSC”). Supra’s claim that it is entitled to these documents rests solely on its allegation that BellSouth is not providing parity under its existing agreement. Once again, the Commission is not adjudicating the present agreement.

Items 15 and 17 request documents relating to any investigations concerning BellSouth’s compliance with the Communications Act of 1934 and this Commission’s service standards, respectively. These requests are part of Supra’s pattern and practice of diverting attention away from the real issues in this case (what terms and conditions should be included in the parties new agreement) and focusing instead on any opportunity to attempt to portray BellSouth as a bad actor.

### **CONCLUSION**

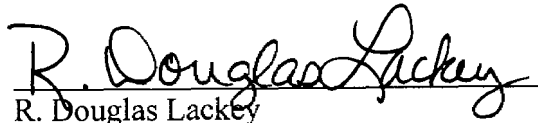
For the foregoing reasons, Supra’s Motion to Compel should be denied, in its entirety and the Commission should sustain BellSouth’s objections to the discovery requests that were the subject of Supra’s motion.

Respectfully submitted, this 31st day of August, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

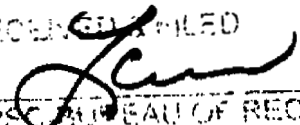
In re: Petition for Arbitration of the Interconnection Agreement Between BellSouth Telecommunications, Inc. and Supra Telecommunications and Information Systems, Inc., pursuant to Section 252(b) of the Telecommunications Act of 1996	Docket No. 001305-TP
Complaint of Supra Telecommunications and Information Systems Regarding BellSouth's Bad Faith Negotiation Tactics	Filed: August 6, 2001

SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC.'S  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO  
BELLSOUTH TELECOMMUNICATIONS, INC.

Pursuant to FPSC Rules, Supra Telecommunications & Information Systems, Inc. ("Supra") by and through its undersigned counsel, request BellSouth Telecommunications, Inc. ("BellSouth"), to produce the following documents for inspection and copying at the offices of Supra at 2620 SW 27<sup>th</sup> Ave., Miami, Florida 33133-3001, within 20 days from the date set forth herein:

**DEFINITIONS AND INSTRUCTIONS**

1. The word "document" is used in these requests in the broad and liberal sense and means any written, typed, printed, recorded or graphic matter, however produced or reproduced, of any kind and description, whether sent, received, or neither, and all copies which differ in any way from the original (whether by interlineation, stamped received, notation, indication of copy sent or received or otherwise) regardless of whether designated confidential, privileged or otherwise and whether an original, master, duplicate or copy, including, but not limited to, papers, notes, accounts statements or

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summaries, ledgers, pamphlets, periodicals, books, advertisements, objects, letters, memoranda, notes or notations of conversations, contracts, agreements, drawings, telegrams, audio or video tape recordings, communications, including inter-office and intra-office memoranda, delivery tickets, bills of lading, invoices, quotations, claims documents, reports, records, studies, work sheets, working papers, corporate records, minutes of meetings, circulars, bulletins, notebooks, bank deposit slips, bank checks, canceled checks, check stubs, diaries, diary entries, appointment books, desk calendars, data processing cards and/or tapes, computer software, electronic mail messages, photographs, transcriptions or sound recordings of any type of personal or telephone conversations, interviews, negotiations, meetings or conferences, or any other things similar to any of the foregoing.

2. The term "communication" as used in these requests means any words heard, spoken, written or read, regardless of whether designated confidential, privileged or otherwise, and including, without limitation, words spoken or heard at any meeting, discussion, interview, encounter, conference, speech, conversation or other similar occurrence, and words written or read from any document(s) as described above.

3. The term "person" as used in these requests means individuals or entities of any type, including, but not limited to, natural persons, governments (or any agencies thereof), quasi-public entities, corporations, partnerships, groups, mutual or joint ventures and other forms of organizations or associations.

4. The term "date" as used in these requests shall mean the exact day, month and year, if ascertainable, or if not, the best approximation thereof (including by relationship to other events).

5. As used herein, the words or phrases "explaining," "describing," "defining," "concerning," "reflecting" or "relating to," when used separately or in conjunction with one another, mean directly or indirectly mentioning, pertaining to, involving, being connected with or embodying in any way or to any degree the stated subject matter.

6. The term "relate to," or any similar phrase, shall mean refer to, reflect on, concern or be in any way logically or factually connected with the matter discussed.

7. For each document encompassed by these requests that BellSouth claims to be privileged from or otherwise protected against discovery on any ground, BellSouth shall expressly make the claim(s), fully setting forth all grounds for the privilege or protection and shall expressly describe the document with a degree of specificity that will enable counsel for Supra to assess the applicability of the claimed privilege or protection.

8. If a request is made for the production of documents which are no longer in the possession, custody and/or control of BellSouth, state when such documents were most recently in the possession, custody and/or control of BellSouth and what dispositions were made of them, including the identity of the person(s) believed to be presently in possession, custody and/or control of the documents. If a document has been destroyed, state when such document was destroyed, identify the person(s) who destroyed the document, the person(s) who directed that the document be destroyed, and the reasons the document was destroyed.

9. Unless otherwise specified, each request requires a full answer for every period of time with respect to which BellSouth intends to offer any evidence.

10. If more than one version of a requested document exists (e.g., a clean version and one with handwritten or other notations), and if one or more documents have any writing

on them which differentiates them from other copies, BellSouth shall produce all such versions.

11. These document requests are continuing and, if at any time subsequent to production of the documents requested herein, any document responsive to this request is located or comes within the custody, possession or control of BellSouth, Supra requests that it forthwith be produced.

## REQUESTED DOCUMENTS

1. Please produce all documents that are identified in BellSouth's Response to Supra's 1<sup>st</sup> Set of Interrogatories.
  
2. For each BellSouth Central Office identified in **Supra Exhibit 1 attached hereto**, please produce:
  - (a) the network configuration,
  - (b) the security configuration,
  - (c) the software configuration,
  - (d) the switch type and equipment manufacturer's responsibilities, including, but not limited to, (i) written requirements; (ii) system documentation; (iii) software validation; (iv) emergency procedures and (v) emergency equipment availability,
  - (e) the list of equipment and their uses,
  - (f) the schematic drawing,
  - (g) the network design,
  - (h) the **Network Operations** forum references,
  - (i) the provisioning information and guidelines for all services and elements that the underlying equipment identified in (d) above are capable of providing,
  - (j) the SS7 and other critical service protocols,
  - (k) the E911 configuration,
  - (l) the route set congestion messages, parameters and gateway screening,
  - (m) the diversity route identifications and verification,
  - (n) the performance service level agreements with other carriers,
  - (o) the contact/escalation procedures,



- (p) the maintenance procedures,
- (q) the in-depth root cause analysis of failures,
- (r) the alternate routing rearrangements,
- (s) the explicit forecasting information regarding direct traffic and  
subtending/transiting traffic,
- (t) the network transition (i) growth/consolidation of network elements; (ii) NPA  
splits; and (iii) major rehomings, rearrangement plans,
- (u) the tones and announcements for unsuccessful call attempts,
- (v) the format of billing records data exchange including (i) statement on  
compliance on EMR standards or otherwise and (ii) differences between  
BellSouth's billing format and EMR standards,
- (w) the service level agreements,
- (x) identify protocol elements in terms of the seven layer model OSI protocol  
stack,
- (y) the administration configuration, and/or
- (z) any other changes made to any other configuration, for the period of June 1,  
2000 through the present date,
- (aa) the number of customers that are served by BellSouth based on the following  
class of service: (i) residential; (ii) business; (iii) PBX trunks; (iv)  
interexchange; and (v) CPE Coin, and
- (bb) the number of NPA NXX used and unused.

In regards to the equipment identified in 2(e) above, please produce documents evidencing:

- (a) equipment installation practices and procedures, and
- (b) maintenance practices and procedures.

3. For each of the services contained in BellSouth's General Services Tariff, Private Line Services Tariff, Access Services Tariff, and Florida Price List identified in **Supra Exhibit 2 attached hereto**, please produce documents evidencing:

- (a) the network elements that are included on the service order, created by BellSouth's retail operations, to create each and every service, and
- (b) the USOCs with rates for all the elements identified in (a) above.

4. For each of the UNEs identified in **Supra Exhibit 3 attached hereto**, please produce documents evidencing:

- (a) the USOCs with rates,
- (b) the provisioning systems that Supra will use to submit orders for these elements, and
- (c) the applicable TELRIC cost studies.

5. In regards to BellSouth's "winback" and "full circle" programs, or any other similar program, please produce documents evidencing:

- (a) the program details,

- (b) the program training manual of its customer service representatives (“CSRs”) and other employees working at the residential, small business and repair centers,
- (c) the number of lines that BellSouth has won back from ALECs as well as Supra, stated monthly, for the years 1999, 2000 and up to and including June 2001,
- (d) the relationship between the program and BellSouth’s Authorized Partners,
- (e) the source of CPNI used for making outbound and taking inbound calls,
- (f) the BellSouth agency or department responsible for outbound and inbound calls, and
- (g) the script used for outbound and inbound calls.
- (h) the names, addresses of any independent agents, consultants, persons, or associations used in the programs. Please include all contracts, correspondence, report, and expenses associated with such agents, consultants, persons or associations.

6. Please produce the minutes of all meetings of the UNE-P Project Team consisting of Sandra Harris, Carla Lockerd, Frank Eberle, Jayne Sullivan, Debbie Williams, William Gullas, and/or any other person(s) from 1999 to date.

7. Please produce all BellSouth training manuals used to train its CSRs or other personnel who work for BellSouth’s retail division and all other operations on the systems identified in Supra’s 2<sup>nd</sup> Set of Interrogatories Item Nos. 13 and 20.

8. Please produce all contracts and documents that evidence the relationship between BellSouth Long Distance and BellSouth in BellSouth's entire service region.

9. Please produce all documents, contracts and evidence that will establish the:

- a. Relationship between BellSouth and BSCN;
- b. Types of services and elements contained in the BSCN;
- c. Rates and terms by which the services and elements; and
- d. Design of the BSCN.

10. Please produce all performance reports, including employee evaluations, commissioned by BellSouth on its LCSC operations from October 1999 to date.

11. All documents and reports, produced by any source, which evidence, include, reflect or relate to performance measurements that BellSouth provides or is required to provide by law or its own internal procedures for the five OSS functions set forth by the Telecommunications Act and the FCC.

12. All documents which evidence or reflect BellSouth's policies and procedures regarding Supra's PONs which sit in clarification and/or pending status for 10 days or more.

13. All documents which evidence or reflect any existing DS1 interoffice transport facilities between BellSouth offices across any interLATA boundaries.

14. Provide a process flow from start to finish for the following operations: (a) when a telephone subscriber calls an ALEC for new service and the ALEC CSR will have to use either LENS or paper LSR; (b) when a telephone subscriber calls BellSouth retail office for a new residential line; (c) when a telephone subscriber calls BellSouth retail office for a new business line (d) when a telephone subscriber calls BellSouth retail office for a new PRI/T1. The process flow should describe all the databases that the order will flow through before being finally provisioned.

15. All documents which evidence or reflect the informal investigation by the FCC into potential violations by BellSouth Corporation ("BellSouth Corp.") of section 251(c)(1) of the Communications Act of 1934, as amended, and section 51.301 of the Commission's rules, in connection with BellSouth Corp.'s alleged failure to negotiate in good faith the terms and conditions of an amendment to an interconnection agreement with Covad Communications Company relating to BellSouth Corp.'s provision of unbundled copper loops in nine states.

16. Provide all maps, diagrams, videos and documents detailing BellSouth's network architecture in the State of Florida.

17. All documents which evidence or reflect "Initiation of Show Cause Proceeding Against BellSouth Telecommunications, Inc. for Violation of Service Standards"  
FPSC Docket No. 991378-TL

18. All documents which evidence BellSouth's spectrum management procedures and policies as well policies and procedures that BellSouth uses to determine which services can be deployed.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was served by Federal Express upon Nancy B. White, Esq., 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301-1556, Douglas R. Lackey, Esq. and Phillip J. Carver, Esq., BellSouth Center, Suite 4300, 675 West Peachtree Street, N.E., Atlanta, Georgia 30375, and Wayne Knight, Esq., Florida Public Service Commission, 2450 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 on this 6 day of August, 2001.

SUPRA TELCOMMUNICATIONS  
& INFORMATION SYSTEMS,  
INC.

2620 S.W. 27<sup>th</sup> Ave.

Miami, Florida 33133

Telephone: 305/476-4248

Facsimile: 305/443-1078

By: 

-BRIAN CHAIKEN