

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of the Florida
Competitive Carriers Association
Against BellSouth Telecommunications, Inc.
Regarding BellSouth's Practice of Refusing
To Provide FastAccess Internet Service to
Customers who Receive Voice Service from a
Competitive Voice Provider and Request for
Expedited Relief.

Docket No. 020507-TP

**THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S SUPPLEMENTAL
RESPONSES TO BELL SOUTH TELECOMMUNICATIONS, INC.'S FOURTH SET OF
INTERROGATORIES (NOS. 69(d) AND 70)**

The Florida Competitive Carriers Association (FCCA), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.280(b) and 1.340, Florida Rules of Civil Procedure, hereby supplements its Responses to BellSouth Telecommunications, Inc.'s Fourth Set of Interrogatories (Nos. 69(d) and 70). In providing these responses, the FCCA does not waive and incorporates herein all of its objections, filed on January 13, 2003, to BellSouth's Fourth Set of Interrogatories.

INTERROGATORIES

INTERROGATORY NO. 69: In connection with Georgia Docket 11901-U, in MCI's responses to BellSouth's Second Interrogatories (Public Disclosure Version), MCI reported that WorldCom Inc. currently offers fixed broadband services to residential and business customers in markets that include Pensacola, Florida and Tallahassee, Florida. (Response to 61, Public Disclosure Version). At page 2 of Ms. Lichtenberg's testimony, she states that "When customers have the option of migrating to a competitive provider for voice service and losing FastAccess, or staying with BellSouth for voice service and keeping their DSL service, customers decide to retain FastAccess." With regard to this statement please:

- d. Does MCI offer DSL service anywhere in Florida other than Pensacola and Tallahassee; if yes, describe with particularity the nature of the DSL service, the numbers of customers receiving such service, and how long the service has been offered in Florida.

RESPONSE:

- d. WorldCom has been offering DSL service in Miami, Florida since at least November 2001. As of January 31, 2003, WorldCom was providing DSL service to [REDACTED] business customers and [REDACTED] residential customers. The residential customers are retail customers of internet service providers to which WorldCom provides private label services. The business customers include [REDACTED] customers

DOCUMENT NUMBER DATE

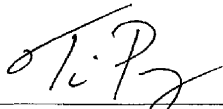
02268 MAR-6 3

FPSC-COMMISSION CLERK

served on a resale basis. WorldCom does not sell voice service in conjunction with this resale of DSL service.

INTERROGATORY NO. 70: At page 3, lines 18.– 20, of the rebuttal testimony of Sherry Lichtenberg, she refers to 5,233 rejects “because the customer had FastAccess service.” State how many of the 5,233 rejects related to customers in Pensacola, Florida.

RESPONSE: There were 91 PONs for Pensacola, Florida customers for which rejects were received. In one case, there were two rejects for the same PON, so the total number of rejects was 92.



Joseph A. McGlothlin
Vicki Gordon Kaufman
Timothy J. Perry
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman & Arnold, PA
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 Telephone
(850) 222-5606 Telefax

Attorneys for the Florida Competitive
Carriers Association

CERTIFICATE OF SERVICE

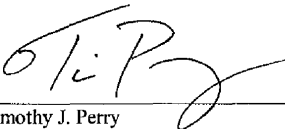
I **HEREBY CERTIFY** that a true and correct copy of the foregoing Responses to BellSouth Telecommunications, Inc.'s Fourth Set of Interrogatories (Nos. 69(d) and 70) have been furnished by (*) hand delivery, (**) electronic mail, or U. S. Mail this 6th day of March 2003, to the following:

(*) (**) Patricia Christensen
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

(*) (**) Nancy White
(**) Meredith Mays
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

(**) Floyd R. Self
215 South Monroe Street, Suite 701
Tallahassee, Florida 32301

(**) Nanette Edwards
Director-Regulatory
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, Alabama 35802



Timothy J. Perry