

Meredith E. Mays  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
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(404) 335-0750

July 16, 2003

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


**Re: Docket No. 020507-TL (FCCA Complaint)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Specified Confidential Classification for Supplemental Responses to MCI's First Set of Interrogatories Item Nos. 9 and 10, which we ask that you file in the captioned docket.

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,

  
Meredith E. Mays (LMA)

Enclosure

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

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**CERTIFICATE OF SERVICE  
DOCKET NO. 020507-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and FedEx this 16<sup>th</sup> day of July 2003 to the following:

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Meredith E. Mays (KRB)

**(+) Signed Protective Agreement**

**PROPRIETARY**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of the Florida )  
Competitive Carriers Association ) Docket No. 020507-TL  
Against BellSouth Telecommunications, Inc. )  
And Request for Expedited Relief ) Filed: July 16, 2003

**SUPPLEMENTAL RESPONSE OF  
BELLSOUTH TELECOMMUNICATIONS, INC. TO  
MCI'S FIRST SET OF INTERROGATORIES (Nos. 9, 10, 14 and 15)**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.206, Florida Administrative Code and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following Supplemental Response to MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc.'s ("MCI's") First Set of Interrogatories (Nos. 9, 10, 14 and 15) dated June 20, 2003 referred to as "discovery". This response is subject to the general and specific objections BellSouth has filed with regard to MCI's First Set of Interrogatories.

REQUEST: For the most recent analog residential line count provided in response to Interrogatory No. 1.b, please state:

the number of lines served by digital loop carrier ("DLC");

the number of lines served by DLC for which alternative copper loop facilities are not currently available (because, for example, they have been taken out of service) for CLEC DSL loops.

RESPONSE: BellSouth has objected to this interrogatory. Subject to, and without waiving its objection, the lines served by DLC in Florida as of June, 2003 indicates 3,487,283 lines are served by DLC in Florida.

RESPONSE BY: W. Keith Milner

REQUEST: For the most recent analog business line count provided in response to Interrogatory No. 1 c, please state:

the number of lines served by DLC;

the number of lines served by DLC for which alternative copper loop facilities are not currently available (because, for example, they have been taken out of service) for CLEC DSL loops.

RESPONSE: BellSouth has objected to this interrogatory. Subject to, and without waiving its objection, the lines served by DLC in Florida as of June, 2003 indicates 3,487,283 lines are served by DLC in Florida.

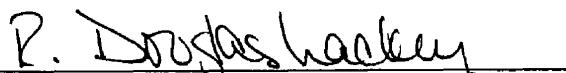
RESPONSE BY: W. Keith Milner

Respectfully submitted this 16<sup>th</sup> day of July 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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