



*allegiancetelecom, inc.*

700 E. Butterfield Rd.  
Suite 400  
Lombard, IL 60148  
630/522-5200 phone  
630/522-5205 fax

**ORIGINAL**

RECEIVED-FPSC

03 OCT 20 AM 10: 27

COMMISSION  
CLERK

October 17, 2003

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

DISTRIBUTION CENTER  
03 OCT 20 AM 9: 50

**Re: Docket No. 030851-TP**

Dear Ms. Bayo:

Allegiance Telecom, Inc., hereby provides notice that it has sent its IO Objections to BellSouth's First Set of Interrogatories and First Set of Production of Documents in the above 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,

*Jeffrey J. Binder*  
Jeffrey J. Binder

cc: All Parties of Record

RECEIVED & FILED

*Jh*  
FPSC-BUREAU OF RECORDS

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
IPC \_\_\_\_\_  
IMS \_\_\_\_\_  
EC    \_\_\_\_\_  
JTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

10220 OCT 20 03

FPSC-COMMISSION CLERK

**Certificate of Service  
Docket No. 030851-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and US Mail on October 17, 2003 to the following:

Jason Rojas  
Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[jrojas@psc.state.fl.us](mailto:jrojas@psc.state.fl.us)

Jeremy Susac  
Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[jsusac@psc.state.fl.us](mailto:jsusac@psc.state.fl.us)

Adam Teitzman  
Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)

Michael Gross  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm.Assoc.  
246 East 6th Avenue  
Tallahassee, FL 32303  
[mgross@fcta.com](mailto:mgross@fcta.com)

Joseph A. McGlothlin  
McWhirter, Reeves, McGlothlin, Davidson, Kaufman &  
Arnold PA  
117 South Gadsden  
Tallahassee, FL 32301  
[jmcglothlin@mac-law.com](mailto:jmcglothlin@mac-law.com)

Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin, Davidsc  
Arnold PA  
117 South Gadsden  
Tallahassee, FL 32301  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

DOCUMENT NUMBER-DATE

10220 OCT 20 03

FPSC-COMMISSION CLERK

Charles E. Watkins  
Covad Communications Company  
19th Floor  
1230 Peachtree Street, N.E.  
Atlanta, GA 30309  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

Nanette Edwards  
Director-Regulatory  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, AL 35802  
[nedwards@itcdelta.com](mailto:nedwards@itcdelta.com)

Floyd Self  
Messer Caparello & Self  
Represents ITC^DeltaCom  
Suite 701  
215 South Monroe Street  
Tallahassee, FL 32301  
[fself@lawfla.com](mailto:fself@lawfla.com)

Floyd Self  
Messer Caparello & Self  
Represents KMC  
Suite 701  
215 South Monroe Street  
Tallahassee, FL 32301  
[fself@lawfla.com](mailto:fself@lawfla.com)

De O'Roark, Esq.  
MCI WorldCom Communications, Inc.  
Suite 3200  
6 Concourse Parkway  
Atlanta, GA [3032de.oroark@wcom.com](mailto:3032de.oroark@wcom.com)


Donna McNulty, Esq.  
MCI WorldCom Communications, Inc.  
Suite 201  
1203 Governors Square Blvd.  
Tallahassee, FL 32301-2960  
[Donna.mcnaulty@wcom.com](mailto:Donna.mcnaulty@wcom.com)

Tracy Hatch, Esq.  
AT&T  
Suite 700  
101 North Monroe Street  
Tallahassee, FL 32301  
[thatch@att.com](mailto:thatch@att.com)

Lisa Sapper  
AT&T  
Suite 8100  
1200 Peachtree Street, N.E.  
Atlanta, GA 30309  
[lsapper@att.com](mailto:lsapper@att.com)

Marva Brown Johnson  
KMC Telecom III, LLC  
1755 North Brown Road  
Lawrenceville, GA 30034-811  
[Marva.johnson@kmctelecom.com](mailto:Marva.johnson@kmctelecom.com)

Susan S. Masterson  
Sprint-Florida  
Sprint Communications Co. L.P.  
PO Box 2214  
1313 Blair Stone Road  
Tallahassee, FL 32316-2214  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

  
Theresa Larkin  
Theresa Larkin

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising ) Docket No. 030851-TP  
From Federal Communications Commission's )  
Triennial UNE review: Local Circuit Switching )  
For Mass Market Customers )  
\_\_\_\_\_ )

**INITIAL OBJECTIONS OF ALLEGIANCE TELECOM, INC. TO  
BELLSOUTH'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Allegiance Telecom, Inc. ("Allegiance"), pursuant to Rule 28-106.206 of the Florida Administrative Code, Rule 1.350 of the Florida Rules of Civil Procedure, and Order No. PSC-03-1054-PCO-TP, issued in this docket on September 22, 2003, hereby files it's Initial Objection to the First Request for Production of Documents of BellSouth ("BSO"), which was served on Allegiance on October 9, 2003 (First Set"). These responses are preliminary at this time and made to comply with the procedural requirement established in Order No. PSC-03-1054-PCO-TP, Issued by the Florida Public Service Commission in this docket on September 22, 2003. Should additional grounds for objection be discovered as Allegiance prepares it's answers to these Document requests, Allegiance reserves the right to supplement, revise, or modify it's objections at the time it serves it's responses.

**GENERAL OBJECTIONS**

1. Allegiance objects to each document request to the extent that it seeks to impose an obligation on Allegiance to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case

on the grounds that such document request is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Allegiance objects to each document request to the extent that it is intended to apply to matters other than the Florida intrastate operations subject to the jurisdiction of the Commission. Allegiance objects to each such document request as being irrelevant, overly broad, unduly burdensome, and oppressive.
3. Allegiance objects to each document request to the extent that it requests information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.
4. Allegiance objects to each document request to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations and are not properly defined or explained for the purposes of this discovery. Any answers provided by Allegiance in response to the First Set will be provided subject to, and without waiver of, the foregoing objection.
5. Allegiance objects to each document request to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding. Allegiance will attempt to state in its responses each instance where this objection applies.

6. Allegiance objects to each document request to the extent that such information is already in the public record before the Commission.
7. Allegiance objects to each document request to the extent that it seeks to have Allegiance create documents not in existence at the time of the request.
8. Allegiance objects to each document request to the extent that it seeks to impose obligations on Allegiance that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.
9. Allegiance objects to each document request to the extent that responding to it would be duly burdensome, expensive, oppressive, or excessively time consuming.
10. Allegiance objects to each document request to the extent that it is not limited to any stated period of time and, therefore, is overly broad and unduly burdensome.

By: \_\_\_\_\_  
Mark Stachiw  
Jeffrey J. Binder  
1919 M Street, N.W., Suite 420  
Washington, DC 20036  
Tel: 202-464-1792  
Fax: 202 464-0762  
e-mail: [jeff.binder@algx.com](mailto:jeff.binder@algx.com)  
Attorneys for Allegiance Telecom, Inc.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 1**

Produce all documents identified in response to BellSouth's First Set of Interrogatories.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome.



**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 2**

Produce every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service in the State of Florida.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 3**

Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Florida to whom you only provide qualifying service.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 4**

Produce all documents referring or relating to the average number of access lines you provide to end user customers in Florida to whom you only provide qualifying service.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 5**

Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Florida to whom you only provide non-qualifying service.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Further, the request would require performance of a special study.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 6**

Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Florida to whom you provide both qualifying and non-qualifying service.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Further, the request would require performance of a special study.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 7**

Produce all documents referring or relating to the average number of access lines you provide to end user customers in Florida to whom you provide both qualifying and non-qualifying service.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Further, the request would require performance of a special study.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 8**

Produce all documents referring or relating to the classifications used by Allegiance to offer service to end user customers Florida (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Further, the request would require performance of a special study.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 9**

Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by Allegiance, as requested in BellSouth's First Set of Interrogatories, No. 34.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Further, the request would require performance of a special study.



**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 10**

Produce all documents referring or relating to the typical churn for each class or type of end user customer served by Allegiance, as requested in BellSouth's First Set of Interrogatories, No. 35.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 11**

Produce all documents referring or relating to how Allegiance determines whether to serve an individual customer's locations with multiple DS0s or with a DS1 or larger transmission system.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 12**

Produce all documents referring or relating to the typical or average number of DS0s at which Allegiance would choose to serve a particular customer with a DS1 or larger transmission system as opposed to multiple DS0, all other things being equal.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 13**

Produce all documents referring or relating to the cost of capital used by Allegiance in evaluation whether to offer a qualifying service in a particular geographic market.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 14**

Produce all documents referring or relating to the time period used by Allegiance in evaluating whether to offer a qualifying service in a particular geographic market (e.g., one year, five years, ten years or some other time horizon over which a project is evaluated)?

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 15**

Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 16**

Produce all documents referring or relating to your estimates of general and administrative (G&A) expenses when evaluating whether to offer a qualifying service in a particular geographic market.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 17**

Produce all documents referring or relating to any complaints by Allegiance or its end user customers about individual hot cuts performed by BellSouth since January 1, 2000.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.



**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 18**

Produce all documents referring or relating to a batch hot cut process used by any ILEC in the BellSouth region that is acceptable to Allegiance or that Allegiance believes is superior to BellSouth's batch hot cut process.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 19**

Produce all documents referring or relating to an individual hot cut process used by any ILEC in the BellSouth region that is acceptable to Allegiance or that Allegiance believes is superior to BellSouth's individual hot cut process.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 20**

Produce all documents referring or relating to a batch hot cut process used by any ILEC outside the BellSouth region that is acceptable to Allegiance or that Allegiance believes is superior to BellSouth's batch hot cut process.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Request for Production of Documents**  
**to Allegiance Telecom of Florida, Inc.**

**Question 21**

Produce all documents referring or relating to an individual hot cut process used by any ILEC outside the BellSouth region that is acceptable to Allegiance or that Allegiance believes is superior to BellSouth's individual hot cut process.

**Answer**

Allegiance objects to this request as overly broad and unduly burdensome. Further the request is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising ) Docket No. 030851-TP  
From Federal Communications Commission's )  
Triennial UNE review: Local Circuit Switching )  
For Mass Market Customers )  
\_\_\_\_\_ )

**INITIAL OBJECTIONS OF ALLEGIANCE TELECOM, INC. TO  
BELLSOUTH'S  
FIRST SET OF INTERROGATORIES**

Allegiance Telecom, Inc. ("Allegiance"), pursuant to Rule 28-106.206 of the Florida Administrative Code, Rule 1.350 of the Florida Rules of Civil Procedure, and Order No. PSC-03-1054-PCO-TP, issued in this docket on September 22, 2003, hereby files it's Initial Objection to the First Set of Interrogatories of BellSouth ("BSO"), which was served on Allegiance on October 9, 2003 (First Set"). These responses are preliminary at this time and made to comply with the procedural requirement established in Order No. PSC-03-1054-PCO-TP, Issued by the Florida Public Service Commission in this docket on September 22, 2003. Should additional grounds for objection be discovered as Allegiance prepares it's answers to these Interrogatories, Allegiance reserves the right to supplement, revise, or modify it's objections at the time it serves it's responses.

**GENERAL OBJECTIONS**

1. Allegiance objects to each interrogatory to the extent that it seeks to impose an obligation on Allegiance to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the

- grounds that such interrogatory is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.
2. Allegiance objects to each interrogatory to the extent that it is intended to apply to matters other than the Florida intrastate operations subject to the jurisdiction of the Commission. Allegiance objects to each such interrogatory as being irrelevant, overly broad, unduly burdensome, and oppressive.
  3. Allegiance objects to each interrogatory to the extent that it requests information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.
  4. Allegiance objects to each interrogatory to the extent that it- is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations and are not properly defined or explained for the purposes of this discovery. Any answers provided by Allegiance in response to the First Set will be provided subject to, and without waiver of, the foregoing objection.
  5. Allegiance objects to each interrogatory to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding. Allegiance will attempt to state in its responses each instance where this objection applies.
  6. Allegiance objects to each interrogatory to the extent that such information is already in the public record before the Commission.

7. Allegiance objects to each interrogatory to the extent that it seeks to have Allegiance create documents not in existence at the time of the request.
8. Allegiance objects to each interrogatory to the extent that it seeks to impose obligations on Allegiance that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.
9. Allegiance objects to each interrogatory to the extent that responding to it would be duly burdensome, expensive, oppressive, or excessively time consuming.
10. Allegiance objects to each interrogatory to the extent that it is not limited to any stated period of time and, therefore, is overly broad and unduly burdensome.

By: \_\_\_\_\_  
Mark Stachiw  
Jeffrey J. Binder  
1919 M Street, N.W., Suite 420  
Washington, DC 20036  
Tel: 202-464-1792  
Fax: 202 464-0762  
e-mail: [jeff.binder@alqx.com](mailto:jeff.binder@alqx.com)  
Attorneys for Allegiance Telecom, Inc.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 4. (f)**

For each switch identified in response to Interrogatory No. 3, please:

- (f) identify all documents referring or relating to the rates, terms, and conditions of Allegiance's use of the switch;

**Answer**

Allegiance objects to this request as overly broad and burdensome.



**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 15**

Identify every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service using: (1) the Unbundled Network Element Platform (UNE-P), (2) self-provisioning switch, (3) switching obtained from a third party provide other than an ILEC, or (4) any combination of these items.

**Answer**

Allegiance objects to this request as overly broad and burdensome.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 16**

Identify any documents that you have provided to any of your employees or agents, or to any financial analyst, bank, or other financial institution, shareholder or any other person that describes, presents, evaluates or otherwise discusses in whole or part, how you intend to offer or provide local exchange service, including but not limited to such things as the markets in which you either do participate or intend to participate, the costs of providing such service, the market share you anticipate obtaining in each market, the time horizon over which you anticipate obtaining such market share, and the average revenues you expect per customer.

**Answer**

Allegiance objects to this request as overly broad and burdensome.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 17**

If not identified in response to a prior Interrogatory, identify every document in your possession, custody, or control referring or relating to the financial viability of self-provisioning switching in your providing qualifying services to end user customers.

**Answer**

Allegiance objects to this request as overly broad and burdensome.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 21**

Describe with particularity the qualifying services that you offer in the geographic areas described in response to Interrogatories 19 and 20, including the rates, terms, and conditions under which such service are offered. If the qualifying services you offer in these areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms, and conditions for such areas, it will be a sufficient answer to identify the web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms, and conditions upon which service is provided.

**Answer**

Allegiance objects to this request as overly broad and burdensome.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 22**

Identify each MSA in Florida where you are currently offering a non-qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

**Answer**

Allegiance objects to this request as overly broad and burdensome.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 23**

If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 24**

Describe with particularity the non-qualifying services that you offer in the geographic areas described in response to Interrogatories 22 and 23, including the rates, terms, and conditions under which such services are offered. If the non-qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available website that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify the website. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms, and conditions upon which service is provided.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 25**

Please state the total number of end user customers in the State of Florida to whom you only provide qualifying service.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.



**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 26**

For those end user customers to whom you only provide qualifying service in the State of Florida, please state the average monthly revenues you receive from each such end user customer.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 27**

For those end user customers to whom you only provide qualifying service in the State of Florida, please state the average number of lines you would provide each such end user customer.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 28**

Please state the total number of end user customers in the State of Florida to whom you only provide non-qualifying service.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 29**

For those end user customers to whom you only provide non-qualifying service in the State of Florida, please state the average monthly revenues you receive from each such end user customer.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 30**

Please state the total number of end users customers in the State of Florida to whom you provide both qualifying and non-qualifying service.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 31**

For those end user customers to whom you only provide qualifying and non-qualifying service in the State of Florida, please state the average monthly revenues you receive from each such end user customer.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 32**

For those end user customers to whom you provide qualifying and non-qualifying service in the State of Florida, please state the average number of lines that you provide each such end user customer.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 34**

For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.



**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 35**

For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical churn rate for each of the end user class or type. Please provide this information for each month from January 2000 to present.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 36**

For each class or type of end user customer referenced in Interrogatory No. 33, please state the share of the local exchange market you have obtained. Please provide this information for each month from January 2000 to the present.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 37**

Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in Florida.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 38**

Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in Florida.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 39**

Describe how the marketing organization that is responsible for marketing qualifying service in Florida is organized, including the organization's structure, size in terms of full time or equivalent employees including contract and temporary employees, and the physical work locations for such employees. In answering this Interrogatory, please state whether you utilize authorized sales representative in your marketing efforts in Florida, and, if so, describe with particularity the nature, extent, and rates, terms, and condition of such use.

**Answer**

Alliance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 42**

What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on network side of the demarcation point) to provide service to the customer with a DS1 rather than multiple DS0s? For instance, if a customer had 10 DS0s, and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, or a digital PBX be required in order to provide equivalent service to the end user that has 10 DS0s? If so, please provide the average cost of the equipment that would be required to provide that functional equivalency (that is, channel bank, or the PBX or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DS0s.)

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 43**

What cost of capital do you use in evaluating whether to offer a qualifying service in a particular geographic market and how is that cost of capital determined?

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 44**

With regard to the cost of capital you use in evaluating whether to provide a qualifying service in a particular geographic market, what are the individual components of that cost of capital, such as the debt-equity ratio, the cost of debt and the cost of equity?

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.



**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 45**

In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one year, five years, ten years or some other time horizon over which you evaluate the project?

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 46**

Provide your definition of sales expense as that term is used in your business.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 47**

Based on the definition of sales expense in the foregoing Interrogatory, please state how you estimate sales expense when evaluating whether to offer a qualifying service in a particular geographic market?

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 48**

Provide your definition of general and administrative (G&A) costs as you use those terms in your business.

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 49**

Based on the definition of G&A costs in the foregoing Interrogatory, please state how you estimate G&A expenses when evaluating whether to offer a qualifying service in a particular geographic market?

**Answer**

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 79**

What are the rates that you contend the Florida Public Service Commission should adopt in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2) (ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

**Answer**

Allegiance objects to this request as premature and Allegiance hasn't finalized its position on this issue.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 80**

What are the appropriate product markets(s) that you contend the Florida Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

**Answer**

The request is premature and Allegiance hasn't finalized its position on this issue.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 81**

What are the appropriate geographic market(s) that you contend the Florida Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

**Answer**

Allegiance objects to this request. It is premature and Allegiance has not finalized its position on this issue.



**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 82**

Do you contend that there are operational barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(2) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to the Interrogatory is in the affirmative, describe with particularity each such operational barrier, and state all facts and identify all documents supporting your contention.

**Answer**

See objection to question 81.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 83**

Do you contend that there are economic barriers within the meaning of the GFCC Rule 51.319(d)(2)(iii)(B)(3) that would support the finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such economic barrier, and state all facts and identify all documents supporting your contention.

**Answer**

See objection to question 81.

**Docket No. 030851-TP**  
**BellSouth Telecommunications Inc.'s First Set of Interrogatories**  
**to Allegiance Telecom of Florida, Inc.**

**Question 84**

What is the maximum number of DS0 loops for each geographic market that you contend requesting telecommunications carriers can serve through unbundled switching when serving multilane end users at a single location that the Florida Public Service Commission should consider in establishing a "cutoff" consistent with FCC Rule 51.319(d)(2)(iii)(B)(4)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

**Answer**

See objection to question 81.