

ORIGINAL

Legal Department

Nancy B. White  
General Counsel - Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

November 12, 2003

RECEIVED FPSC  
03 NOV 12 PM 4:43  
COMMISSION  
CLERK

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. 030851-TP**

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. served its Objections to Covad's First Set of Interrogatories (Nos. 1-18) and First Request for Production of Documents (No. 1), in the above referenced 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,

*Nancy B. White*  
Nancy B. White (KA)

RECEIVED & FILED  
*ih*  
FPSC-BUREAU OF RECORDS

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

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- SEC   1
- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

11303 NOV 12 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 Hand Delivery\* this 12<sup>th</sup> day of November 2003 to the following:

Jason Rojas, Staff Counsel \*  
Jeremy Susac, Staff Counsel  
Adam Teitzman, Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Phone: (850) 413-6212  
Fax: (850) 413-6250  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)  
[jrojas@psc.state.fl.us](mailto:jrojas@psc.state.fl.us)  
[jsusac@psc.state.fl.us](mailto:jsusac@psc.state.fl.us)

Michael A. Gross  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

Joseph A. McGlothlin  
Vicki Gordon Kaufman \*  
McWhirter, Reeves, McGlothlin,  
Davidson, Kaufman & Arnold PA  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Attys. for Covad  
[jmclothlin@mac-law.com](mailto:jmclothlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

Charles E. Watkins  
Covad Communications Company  
1230 Peachtree Street, N.E.  
19<sup>th</sup> Floor  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3492  
Fax. No. (404) 942-3495  
[g Watkins@covad.com](mailto:g Watkins@covad.com)  
[jbell@covad.com](mailto:jbell@covad.com)

Nanette Edwards, Esq.  
Director – Regulatory  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, AL 35802  
Tel. No. (256) 382-3856  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

Floyd Self, Esq. +  
Norman H. Horton, Esq. ~  
Messer Caparello & Self  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32301  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Represents ITC^DeltaCom,  
Represents KMC  
Represents MCI  
Represents Xspedius~  
[fself@lawfla.com](mailto:fself@lawfla.com)  
[nhorton@lawfla.com](mailto:nhorton@lawfla.com)

De O'Roark, Esq. +  
MCI WorldCom Communications, Inc.  
6 Concourse Parkway, Suite 3200  
Atlanta, GA 30328  
[de.oroark@wcom.com](mailto:de.oroark@wcom.com)

Jon Moyle, Jr.  
Moyle Law Firm (Tall)  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301  
Phone: (850) 681-3828  
Fax: 681-8788  
Email: [jmoylejr@moylslaw.com](mailto:jmoylejr@moylslaw.com)

Andrew O. Isar  
Miller Isar, Inc.  
7901 Skansie Avenue  
Suite 240  
Gig Harbor, WA 98335  
Tel. No. (253) 851-6700  
Fax No. (253) 851-6474  
[aisar@millerisar.com](mailto:aisar@millerisar.com)

Jason Spinard, Esq.  
Rand Currier  
Geoff Cookman  
Granite Telecommunications, LLC  
234 Copeland Street  
Quincy, MA 02169  
Tel. No. 617 847-1500  
Fax No. 617 847-0931  
[jspinard@granitenet.com](mailto:jspinard@granitenet.com)  
[rcurrier@granitenet.com](mailto:rcurrier@granitenet.com)  
[gcookman@granitenet.com](mailto:gcookman@granitenet.com)

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

Tracy Hatch, Esq.  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6360  
[thatch@att.com](mailto:thatch@att.com)

Lisa A. Sapper +  
AT&T  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, GA 30309  
Tel. No. (404) 810-7812  
[lisariley@att.com](mailto:lisariley@att.com)

Jake E. Jennings  
NewSouth Communications Corp  
Two North Main Center  
Greenville, SC 29601-2719  
Tel. No. 864 672-5877  
Fax No. 864 672-5313  
[jejennings@newsouth.com](mailto:jejennings@newsouth.com)

Marva Brown Johnson, Esq.  
KMC Telecom III, LLC  
1755 North Brown Road  
Lawrenceville, GA 30034-8119  
[marva.johnson@kmc telecom.com](mailto:marva.johnson@kmc telecom.com)

Susan S. Masterton, Esq.  
Sprint-Florida, Inc.  
Sprint Communications Co. L.P.  
1313 Blair Stone Road  
P.O. Box 2214  
Tallahassee, FL 32316-2214  
Tel. No. (850) 599-1560  
Fax. No. (850) 878-0777  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

Jeffrey J. Binder  
Allegiance Telecom of Florida, Inc.  
1919 M Street, N.W.  
Washington, DC 20037  
Tel. No (202) 464-1792  
[Jeff.binder@algx.com](mailto:Jeff.binder@algx.com)

Terry Larkin  
Allegiance Telecom, Inc.  
700 East Butterfield Road  
Lombard, IL 60148  
Phone: (630) 522-6453  
terry.larkin@alqx.com

Jean Houck  
Business Telecom, Inc.  
4300 Six Forks Road  
Raleigh, NC 27609  
Tel. No. (919) 863-7325  
jean.houck@btitelecom.net

Jonathan Audu  
Manager, Regulatory Affairs  
Supra Telecommunications  
1311 Executive Center Drive  
Suite 220  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
jonathan.audu@stis.com

Margaret Ring, Director  
Regulatory Affairs  
Network Telephone Corporation  
815 S. Palafox St.  
Pensacola, FL 32501  
850-465-1748  
Margaret.Ring@networktelephone.net

Jorge Cruz-Bustillo  
Assistant General Counsel  
Supra Telecommunications & Information  
Systems, Inc.  
2620 S.W. 27th Avenue  
Miami, FL 33133  
Phone: (305) 476-4252  
Fax: (305) 443-1078  
jorge.cruz-bustillo@stis.com

**AT&T by E-Mail only: +**  
**soniadaniels@att.com**

  
\_\_\_\_\_  
Nancy White (KA)

**(+ )signed Protective Agreement**  
**(\*) Hand Delivery**  
**(⊗) Fedex**