

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of

**Complaint of FDN Communications)
for Resolution of Certain Billing Disputes)
and Enforcement of UNE Orders and)
Interconnection Agreements with)
BellSouth Telecommunications, Inc.)**

Docket No. 030829-TP

**FLORIDA DIGITAL NETWORK, INC.'S SECOND SET OF
REQUEST FOR
PRODUCTION OF DOCUMENTS TO
BELLSOUTH TELECOMMUNICATIONS, INC. (4)**

Florida Digital Network, Inc. d/b/a FDN Communications ("FDN") pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, hereby serves its Second Set of Request for Production of Documents to BellSouth Telecommunications, Inc. ("BellSouth") and request that the following documents be provided or made available for inspection and copying at a mutually agreeable location on or before the due date of this discovery.

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc. and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth.

2. The terms "you" and "your" refer to BellSouth.

DOCUMENT NUMBER-DATE

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3. "Florida Digital Network" or "FDN Communications" or "FDN" means Florida Digital Network, Inc., and its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of Florida Digital Network, Inc.

4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "referring or relating to" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

7. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

8. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests and information what would not otherwise not be brought within their scope.

9. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

INSTRUCTIONS

1. If you contend that a document in response to any document request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such document in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the

extent that you claim it is privileged.

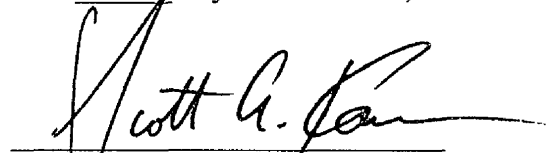
2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information which is physically within BellSouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

3. If any document request cannot be fully complied with, comply to the extent possible and specify the reasons for your inability to comply fully.

DOCUMENT REQUESTS

4. Provide computer disk(s) containing a copy of BellSouth's cost study filed in Docket 990649-TP.

Dated this 20th day of November, 2003.



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