

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements
Arising from Federal Communications
Commission Triennial UNE review: Local
Circuit Switching For Mass Market Customers

Docket No. 030851-TP
Filed: November 24, 2003

**RESPONSE OF NETWORK TELEPHONE CORPORATION TO
ITEM NO. 41 OF BELL SOUTH'S FIRST SET OF INTERROGATORIES
(PUBLIC)**

Network Telephone Corporation ("Network Telephone"), through its undersigned counsel, hereby provides its Objections and Answer to BellSouth's First Set of Interrogatories, Item No. 41. Network Telephone hereby adopts, incorporates by reference, and renews its preliminary Objections of October 20, 2003, as supplemented and clarified on October 27, 2003. As stated in its pleadings of October 20 and October 27, 2003, in responding to this interrogatory Network Telephone assumes the interrogatory relates to intrastate operations in BellSouth's Florida service area. Network Telephone's response follows.

INTERROGATORY 41: Is there a typical or average number of DSOs at which you would choose to serve a particular customer with a DS1 or larger transmission system, all other things being equal? If so, please provide that typical or average number and explain how this number was derived.

OBJECTION AND ANSWER: Network Telephone objects to Item No. 41 on the grounds it asks for confidential and proprietary business information. Notwithstanding the objection, and without waiving it, Network Telephone provides the following answer, which Network Telephone regards as proprietary, pursuant to the terms of the confidentiality agreement between Network Telephone and BellSouth:

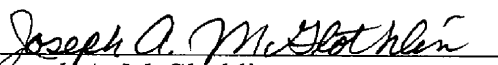
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Objection of Counsel

Answer furnished by Wendell Nelson


Joseph A. McGlothlin
McWhirter, Reeves, McGlothlin, Davidson,
Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 (telephone)
(850) 222-5606 (fax)
jmglathline@mac-law.com

Attorneys for Network Telephone Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Response of Network Telephone Corporation to Item No. 41 of BellSouth's First Set of Interrogatories has been provided by (*) hand delivery, (**) email and U.S. Mail this 24th day of November 2003, to the following:

(**) Adam Teitzman, Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

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

(**) Richard Chapkis
Verizon Florida, Inc.
201 North Franklin Street
MC: FLTC0717
Tampa, Florida 33602

(**) Susan Masterton
Sprint Communications Company
1313 Blairstone Road
Post Office Box 2214
MC: FLTLHO0107
Tallahassee, Florida 32301

(**) Donna Canzano McNulty
MCI WorldCom
1203 Governors Square Boulevard
Suite 201
Tallahassee, Florida 32301

(**) Norman H. Horton, Jr.
215 South Mornoe Street
Tallahassee, Florida 32302-1876

(**) Tracy Hatch
AT&T Communications of the
Southern States, LLC
101 North Monroe Street
Suite 700
Tallahassee, Florida 32301

(**) Michael Gross
Florida Cable Telecommunications
246 East 6th Avenue
Tallahassee, Florida 32302

(**) Matthew Feil
Florida Digital Network, Inc.
390 North Orange Avenue, Suite 2000
Orlando, Florida 32801

(**) Jeffrey J. Binder
Allegiance Telecom, Inc.
1919 M Street, NW
Washington, DC 20037

(**) Floyd R. Self
Messer, Caparello & Self
215 South Monroe Street, Suite 701
Tallahassee, FL 32301

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

(**) Jake E. Jennings
Senior Vice-President
Regulatory Affairs & Carrier Relations
NewSouth Communications Corp.
NewSouth Center
Two N. Main Center
Greenville, SC 29601

(**) Jon C. Moyle, Jr.
Moyle, Flanigan, Katz, Raymond
& Sheehan, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301

(**) Rand Currier
Geoff Cookman
Granite Telecommunications, LLC
234 Copeland Street
Quincy, MA

(**) Andrew O. Isar
Miller Isar, Inc.
2901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335

(**) Scott A. Kassman
FDN Communications
390 North Orange Avenue
Suite 2000
Orlando, FL 32801


Joseph A. McGlothlin