

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE review: Local Circuit Switching for Mass Market Customers.

DOCKET NO. 030851-TP
FILED: JANUARY 16, 2004

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of Staff's Fifth Set of Interrogatories (Nos. 65 through 70), have been served by U.S. Mail upon Floyd Self/Norman Horton, Messer Law Firm, P.O. Box 1876, Tallahassee, Florida 32302-1876 and Ms. Donna C. McNulty, 1203 Governors Square Blvd., Suite 201, Tallahassee, Florida 32301-2960, on behalf of MCI WorldCom Communications, Inc. and MCI MetroAccess Transmission Services, LLC., and that a true and correct copy thereof has been furnished by U.S. Mail, this 2nd day of February, 2004, to the following:

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DOCUMENT NUMBER - DATE

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FPSC-COMMISSION CLERK

STAFF'S FIFTH SET OF INTERROGATORIES TO MCI WORLDCOM
COMMUNICATIONS, INC. AND MCIMETRO ACCESS TRANSMISSION SERVICES, LLC
(NOS. 65 - 70)
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69. For purposes of the following request, please refer to the rebuttal testimony of MCI witness Bryant, page 10, lines 9-13.
- (a) Please explain why the Commission should “place the burden of proof on the ILECs to demonstrate that any intermodal alternative it proposes to count toward the triggers satisfies the ‘comparable in cost, quality, and maturity’.”
 - (b) Please identify all documents that support this position.
70. For purposes of the following request, please refer to the direct testimony of MCI witness Bryant, page 16, lines 4-9. Please explain what is meant by the phrase “rolling access” as related to unbundled local switching.



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