

Nancy B. White
General Counsel - Florida

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

February 24, 2004

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


Re: Docket No. 030852-TP

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. served its Responses to the Florida Public Service Commission Staff's Fourth Set of Interrogatories (Nos. 48-81) and Fourth Request for Production of Documents (Nos. 39-39), in the above referenced 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,


Nancy B. White (BA)

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

527821

DOCUMENT NUMBER-DATE

02725 FEB 24 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission) Docket No. 030852-TP
triennial UNE review: Location-Specific)
Review for DS1, DS3 and Dark Fiber Loops,) Filed: February 24, 2004
and Route-Specific Review for DS1, DS3 and)
Dark Fiber Transport.)

BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSES TO STAFF'S FOURTH SET OF INTERROGATORIES (NOS. 48-81) AND
FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 38-39)

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following Responses to the Florida Public Service Commission Staff Fourth Set of Interrogatories (Nos. 48-84) and Fourth Request for Production of Documents (No. 38-39), dated February 4, 2004.

BellSouth incorporates herein by reference all of its general and specific objections filed on February 11, 2004. Any responses provided by BellSouth in response to this discovery will be provided subject to and without waiving any of BellSouth's previously filed objections.

SPECIFIC RESPONSES

CERTIFICATE OF SERVICE
Docket No. 030852-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery* and FedEx this 24th day of February 2004 to the following:

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

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue, Ste. 100
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

Matthew Feil (+)
Scott Kassman
FDN Communications
2301 Lucien Way
Suite 200
Maitland, FL 32751
Tel. No. 407 835-0460
Fax No. 407 835-0309
mfeil@mail.fdn.com
skassman@mail.fdn.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
jmclglothlin@mac-law.com
vkaufman@mac-law.com
Represents FCCA

Mr. Charles E. Watkins+
1230 Peachtree Street, NE
19th Floor
Atlanta, GA 30309-3574
Phone: (404) 942-3492
Fax: (404) 942-3495
Represents Covad
gwatkins@covad.com
jbelle@covad.com

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

Ms. Donna C. McNulty+ⓧ
MCI WorldCom Communications, Inc.
1203 Governors Square Blvd.,
Suite 201
Tallahassee, FL 32301-2960
Phone No. 850- 219-1008
Fax No. 850 219-1018
Represents MCI WorldCom
donna.mculty@mci.com

De O'Roark, Esq. (+)
MCI WorldCom Communications, Inc (GA)
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328
Represents MCI WorldCom
de.oroark@mci.com

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

Tracy Hatch, Esq. **
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6364
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

Marva Brown Johnson, Esq.
KMC Telecom III, LLC
1755 North Brown Road
Lawrenceville, GA 30043-8119
Tel. No. (678) 985-6261
Fax No.: (678) 985-6213
Represents KMC
marva.johnson@kmctelecom.com

Richard A. Chapkis (+)
Kimberly Caswell
Verizon Florida, Inc.
One Tampa City Center
201 North Franklin Street (33602)
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110
Tel. No. (813) 483-2606
Fax. No. (813) 204-8870
Represents Verizon
Richard.chapkis@verizon.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

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

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

Jon Moyle, Jr.
Moyle Law Firm (Tall)
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
Phone: (850) 681-3828
Fax: 681-8788
Represents NuVox Communications Inc.
Email: jmoylejr@moylelaw.com

Allegiance E-mail Only
charles.gerkin@algx.com

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

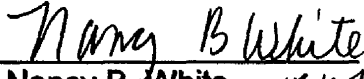
Jorge Cruz-Bustillo +
Assistant General Counsel
Supra Telecommunications
2620 S.W. 27th Avenue
Miami, Florida 33133
Tel. No. (305) 476-4252
Fax. No. (305) 443-1078
jorge.cruz-busitillo@stis.com

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
Email: jonathan.audu@stis.com

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

Bo Russell
Nuvox Communications Inc.
301 North Main Street
Greenville, SC 29601-2171
Phone: (864) 331-7323
Email: brussell@nuvox.com

J. Jeffry Wahlen
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 425-5471
Fax. No. (850) 222-7560
jwahlen@ausley.com


Nancy B. White (NBS)

(+) signed protective agreement
(*) via Hand Delivery
(⊗) via FedEx