

Meredith Mays  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0750

May 20, 2004

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

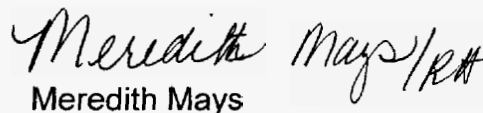
**Re: Docket No. 030829-TP (FDN Complaint)**

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. served its Responses to FDN's Second Set of Interrogatories (Nos. 4-14) and Third Request for Production of Documents (No. 5), 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,

  
Meredith Mays

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

538883

DOCUMENT NUMBER-DATE  
05833 MAY 20 04  
FPSC-COMMISSION CLERK

Meredith Mays  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0750

May 20, 2004

**Via Electronic and FedEx**

Matthew Feil  
Scott Kassman  
FDN Communications  
2301 Lucien Way  
Suite 200  
Maitland, FL 32751

**Re: Docket No. 030829-TP (FDN Complaint)**

Dear Counsel:

Enclosed is BellSouth Telecommunications, Inc.'s Response to FDN's Second Set of Interrogatories (Nos. 4-14) and Third Request for Production of Documents (No. 5), in the above referenced docket.

Sincerely,

  
Meredith Mays

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

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**CERTIFICATE OF SERVICE  
DOCKET NO. 030829-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery\* and/or FedEx this 20<sup>th</sup> day of May, 2004 to the following:

Lee Fordham\*  
Staff Counsel  
Florida Public Service Commission  
Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No.: 850 413-6199  
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Matthew Feil (+)  
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2301 Lucien Way  
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Maitland, FL 32751  
Tel. No. 407 835-0460  
Fax No. 407 835-0309  
[mfeil@mail.fdn.com](mailto:mfeil@mail.fdn.com)  
[skassman@mail.fdn.com](mailto:skassman@mail.fdn.com)

  
Meredith E. Mays

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

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In Re:	)	
	)	
Complaint of FDN Communications for	)	Docket No. 030829-TP
Resolution of Certain Billing Disputes	)	
And Enforcement of UNE Orders and	)	Filed: May 20, 2004
Interconnection Agreements with	)	
BellSouth Telecommunications, Inc.	)	

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**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
RESPONSE TO FLORIDA DIGITAL NETWORK, INC.'S  
SECOND SET OF INTERROGATORIES (NOS. 4-14) AND THIRD REQUEST  
FOR PRODUCTION OF DOCUMENTS (NO. 5)**

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 Florida Digital Network, Inc. d/b/a FDN Communications ("FDN")'s Second Set of Interrogatories (Nos. 4-14) and Third Request for Production of Documents (No. 5), dated April 27, 2004.

BellSouth incorporates herein by reference all of its previously filed general and specific objections. 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**