

ORIGINAL

Matilda Sanders

From: Smith, Debbie N. [Debbie.N.Smith@BELLSOUTH.COM]
Sent: Thursday, September 02, 2004 3:40 PM
To: Filings@psc.state.fl.us
Cc: Fatool, Vicki; Linda Hobbs; Nancy Sims; Slaughter, Brenda ; Holland, Robyn P; Bixler, Micheale; Edenfield, Kip
Subject: Florida Docket No. 040301-TP
Importance: High

A. **Debbie Smith**
 Legal Secretary for E. Earl Edenfield, Jr.
 BellSouth Telecommunications, Inc.
 c/o Nancy Sims
 150 South Monroe, Rm. 400
 Tallahassee, FL 32301-1558
 (404) 335-0772
debbie.n.smith@bellsouth.com

B. Docket No. 040301-TP: In Re: Petition of Supra Telecommunications and Information Systems, Inc.
 for arbitration with BellSouth Telecommunications, Inc.

C. BellSouth Telecommunications, Inc.
 on behalf of E. Earl Edenfield, Jr.

D. 6 pages total

E. BellSouth's Request for Clarification

<<BellSouth's Request for Clarification>>

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9/3/2004

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Legal Department

E. EARL EDENFIELD, JR.
Senior Attorney
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(404) 335-0763

September 2, 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

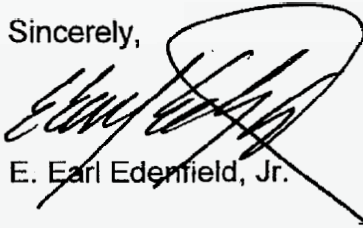
**Re: Docket No.: 040301-TP
Petition of Supra Telecommunications and Information Systems, Inc. for
Arbitration with BellSouth Telecommunications, Inc.**

Dear Ms. Bayó:

Enclosed is BellSouth's Request for Clarification, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



E. Earl Edenfield, Jr.

Enclosure

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

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**CERTIFICATE OF SERVICE
Docket No. 040301-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and U.S. Mail this 2nd day of September, 2004 to the following:

Jason Rojas
Jeremy Susac
Staff Counsels
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E. Earl Edenfield, Jr.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Supra Telecommunications)
 and Information Systems, Inc.'s for) Docket No.: 040301-TP
 arbitration with BellSouth)
 BellSouth Telecommunications, Inc.)
 _____) Filed: September 2, 2004

BELLSOUTH'S REQUEST FOR CLARIFICATION

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to the Commission's Procedural Order (PSC-04-0809--PCO-TP) dated August 19, 2004, files this Request for Clarification of Supra Telecommunications and Information Systems, Inc.'s ("Supra") Second Request for Production of Documents (Nos. 3-20) dated August 26, 2004.

REQUESTS FOR PRODUCTION

RFP 7: Please provide any and all documentation which supports the total number of loops in BellSouth's territory in the state of Florida which are served by IDLC. As BellSouth has previously indicated that it has separately identified UNE-P billed, IDLS served lines, please provide this breakdown by retail resale, UNE-P, UNE-L, and all other such that the sum of the parts equals the whole.

BellSouth seeks clarification of the second sentence of Request for Production No. 7. Specifically, BellSouth has no context surrounding what Supra is referencing in the phrase "as BellSouth has previously indicated" and needs to understand that context to appropriately respond to the request. BellSouth requests that Supra identify, with specificity, where BellSouth made the "indication" alleged by Supra.

RFP 9: Please provide any and all maps, lists, databases or other documents which show the total number of loops, by wire center, by CLLI code, in BellSouth's territory in the state of Florida, that are served via IDLC using

- a. BellSouth's INA,
- b. IDLC to DCS with the ability to groom a DS0 from the IDLC F2 to a Supra facility point of interface (POI),
- c. IDLC to DCS without the ability to groom DS0's,

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- d. any other F2 – switch interconnect process or system(s) used in significant volume.

BellSouth seeks clarification of subparts (b), (c), and (d) of Request for Production No. 9. Specifically, in subpart (b), Supra's network hypothetical makes no sense as IDLC that goes to a DCS does not groom on the F2. As to subpart (c), this hypothetical network configuration is irrelevant because all IDLC going through a DCS can groom at the DS0 level. Finally, as to subpart (d), BellSouth simply has no idea what Supra means in this request. BellSouth cannot respond to the requests as written and seeks clarification on these specific subparts.

RFP 13: Please provide any and all maps, lists, databases or other documents which show the total number of DS0 equiv GR303¹ lines licensed by switch CLLI, by wire center CLLI code, in BellSouth's territory in the state of Florida. Identify the quantity of each (DS0 equivalent level) that is in service.

BellSouth seeks clarification of portions of the first sentence of Request for Production No. 13. Specifically, BellSouth does not understand what Supra means by the phrases "licensed by switch CLLI" and "equivalent GR303 lines" and needs clarification to understand the request sufficiently to form a response. BellSouth asks that Supra define these phrases in the context of the request.

RFP 14: Please provide any and all maps, lists, databases or other documents which show the total number of DS0 equiv TR08² lines licensed by switch CLLI, by wire center CLLI code, in BellSouth's territory in the state of Florida. Identify the quantity of each (DS0 equivalent level) that is in service.

BellSouth seeks clarification of portions of the first sentence of Request for Production No. 14. Specifically, BellSouth does not understand what Supra means by the phrases "licensed by switch CLLI" and "equivalent TR08 lines" and needs clarification to understand the request sufficiently to form a response. BellSouth asks that Supra define these phrases in the context of the request.

¹ GR303, TR303 and all equivalent protocols.

² GR08, TR08 and all equivalent protocols.

RFP No. 15: Please provide any and all documents which evidence BellSouth's processes and procedures to use GR303 or TR08 versus other methods of F2 protocol.

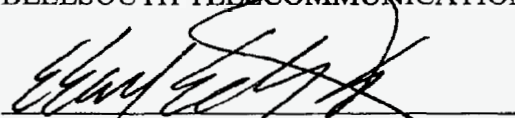
BellSouth seeks clarification of a portion of Request for Production No. 15. Specifically, BellSouth does not understand what Supra means by the phrases "F2 protocol" as that phrase is used in comparison to GR303 and TR08 and BellSouth needs clarification to understand the request sufficiently to form a response. BellSouth asks that Supra define this phrase in the context of the request.

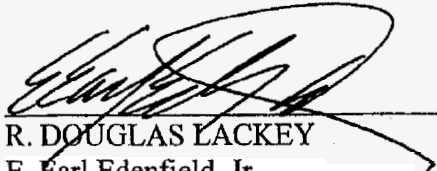
RFP 18: Please provide documentation that identifies, and documents the as-installed capabilities of the various NGDLC systems deployed by BellSouth which would support the grooming of DS0 equivalent level calls onto a Supra leased facility, rather than BellSouth common facilities, clearly stating what capabilities are, and are not installed, configure, optioned, or available in BellSouth's network. Supra expects that this should allow for a limited number of broad classifications, rather than a remote terminal by remote terminal inventory. Identify separately, options which are currently "productionized" and available.

BellSouth seeks clarification of the entirety of Request for Production No. 18. The request is so indecipherable that BellSouth is not really sure how to request a clarification that would help make sense of the request. Further, BellSouth is not sure what "productionized" means as stated in this request. BellSouth simply cannot respond to this request as written and asks that Supra either withdraw the request or try to rephrase it.

Respectfully submitted this 2nd day of September 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.


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