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> > January 30, 2006

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Ms. Blanca S. Bayo, Director Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

Re: Docket Nos. 050119-TP and 050125-TP

Dear Ms. Bayo:

ECR

GCL

OPC \_\_\_\_\_

KAH/rl

Enclosures

SCR

OTH

SGA

SEC

Enclosed for filing in the above-referenced docket on behalf of TDS Telecom, d/b/a TDS Teelcom/Quincy Telephone, Northeast Florida Telephone Company, d/b/a NEFCOM, GTC, Inc., d/b/a GT Com, Smart City Telecommunications, LLC d/b/a Smart City Telecom and Frontier Communications of the South, LLC ("Small LECs") are the following documents:

1. Original and fifteen copies of Prefiled Rebuttal Testimony of Steven W. Watkins; and

2. The Small LECs' Request for Clarification of Certain Interrogatories Included in Staff's First Set of Interrogatories (Nos. 1-17).

CMP Please acknowledge receipt of these documents by stamping the extra copy of this letter filed and returning the copy to me.

**CTR** \_\_\_\_\_ Thank you for your assistance with this filing.

Sincerely,

Kenneth A. Hoffman

& FILFD REAU OF RECORDS



Page 2 January 30, 2006

#### **CERTIFICATE OF SERVICE**

I HEREBY certify that a copy of the foregoing was furnished to the following this 30<sup>th</sup> day of January, 2006, by Hand Delivery(\*) or United States Mail to the following:

Nancy B. White, Esq.(\*) c/o Nancy H. Sims 150 South Monroe Street Suite 400 Tallahassee, Florida 32301

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Page 3 January 30, 2006

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Michael A. Gross, Esq.(\*) Florida Cable Telecommunications, Assn. 246 E. 6<sup>th</sup> Avenue, Suite 100 Tallahassee, FL 32303

offman, Esq.

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#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Joint Petition of TDS Telecom d/b/a ) TDS Telecom/Quincy Telephone, ALLTEL ) Florida, Inc., Northeast Florida Telephone ) Company d/b/a NEFCOM, GTC, Inc. d/b/a ) GT Com, Smart City Telecommunications, ) LLC d/b/a Smart City Telecom, ITS Tele- ) communications Systems, Inc. and Frontier ) Communications of the South, LLC, ) ("Joint Petitioner") objecting to and ) requesting suspension of Proposed Transit ) Traffic Service Tariff filed by BellSouth ) Telecommunications, Inc. )

Docket Nos. 050119-TP and 050125-TP

Filed: January 30, 2006

# SMALL LOCAL EXCHANGE COMPANIES' REQUEST FOR CLARIFICATION OF CERTAIN INTERROGATORIES INCLUDED IN STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-17)

TDS Telecom, d/b/a TDS Telecom/Quincy Telephone, Northeast Florida Telephone Company, d/b/a NEFCOM, GTC, Inc. d/b/a GT Com, Smart City Telecommunications, LLC d/b/a Smart City Telecom and Frontier Communications of the South, LLC (the "Small LECs"), by and through their undersigned counsel, and pursuant to Order No. PSC-05-1206-PCO-TP, hereby requests clarification from the Commission Staff regarding the following interrogatories included in Staff's First Set of Interrogatories (Nos. 1-17) to the Small LECs:

1. <u>Staff Interrogatory No. 9</u>: How do the rules and orders identified in (5) affect charges for transiting traffic?

### Request for Clarification:

The Small LECs believe that Staff intended to refer to Interrogatory No. 8 instead of Interrogatory No. 5. Small LECs will respond to Interrogatory No. 9 in this manner (with reference to Interrogatory No. 8) unless otherwise advised by Staff.

> DOCUMENT NUMBER -DATE 00886 JAN 30 8 FPSC-COMMISSION CLERK

2. <u>Staff Interrogatory No. 11.e</u>: Does the EAS toll restriction between BellSouth and the Small LECs include calls from another carrier to the Small LEC through BellSouth's network? Please explain.

### Request for Clarification:

The Small LECs are unclear as to what the Staff means by the phrase "EAS toll restriction"

and, are therefore, unable to formulate a response to Staff Interrogatory No. 11e.

WHEREFORE, for the reasons stated above, the Small LECs request clarification of Staff

Interrogatory Nos. 9 and 11.e.

,

Respectfully submitted,

Kenneth A. Hoffman, Esq. Martin P. McDonnell, Esq. Rutledge, Ecenia, Purnell & Hoffman, P.A. P.O. Box 551 Tallahassee, FL 32302 850-681-6788 (Telephone) 860-681-6515 (Telecopier)

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By:\_

Kenneth A. Hoffman, Esq. nftc\transit.clarification