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March 1, 2006

VIA OVERNIGHT DELIVERY

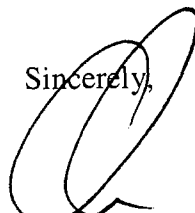
Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
& Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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

Dear Ms. Bayó:

Enclosed for filing on behalf of Verizon Wireless are an original and two (2) copies of Verizon Wireless' Request for Clarification of Interrogatory No. 15 Included in Staff's Second Set of Interrogatories to Verizon Wireless (Nos. 15-16) and Request for Production of Documents No. 1 Included in Staff's First Request for Production of Documents to Verizon Wireless (No. 1) in the above referenced dockets. Please return one copy of this filing to me in the enclosed stamped envelope.

Sincerely,



Charles F. Palmer

CFP/jab
Enclosures

cc: All Parties of Record

DOCUMENT NUMBER-DATE

01833 MAR-1 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint petition by 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 Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC ["Joint Petitioners"] objecting to and requesting suspension and cancellation of proposed transit traffic service tariff filed by BellSouth Telecommunications, Inc.

DOCKET NO. 050119-TP

In re: Petition and complaint for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc., by AT&T Communications of the Southern States, LLC.

DOCKET NO. 050125-TP

DATED: MARCH 1, 2006

VERIZON WIRELESS' REQUEST FOR CLARIFICATION OF INTERROGATORY NO. 15 INCLUDED IN STAFF'S SECOND SET OF INTERROGATORIES TO VERIZON WIRELESS (NOS. 15-16) AND REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1 INCLUDED IN STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO VERIZON WIRELESS (NO. 1)

Verizon Wireless, pursuant to Order No. PSC-05-1206-PCO-TP, hereby requests clarification from the Commission Staff regarding the following interrogatory included in Staff's Second Set of Interrogatories to Verizon Wireless (Nos. 15-16) and request for production included in Staff's First Request for Production of Documents to Verizon Wireless (No. 1):

1. Staff Interrogatory No. 15: Please refer to page 5, lines 10-14, of the direct testimony of Verizon Wireless' witness Sterling. Please identify the transit service rate included in the Florida interconnection agreements between BellSouth and ALLTEL Florida, Inc., GTC, Inc. d/b/a GT Com, Smart City Telecommunications, and LLC d/b/a Smart City Telecom.

- a. Please explain how the rates were determined.
- b. Are the rates TELRIC rates or market rates?

Request for Clarification:

Verizon Wireless believes that Staff intended to refer to the ICAs between Verizon Wireless and ALLTEL Florida, Inc., GTC, Inc. d/b/a GT Com, Smart City Telecommunications, and LLC d/b/a Smart City Telecom. Verizon Wireless will respond to Interrogatory No. 9 in this manner unless otherwise advised by Staff.

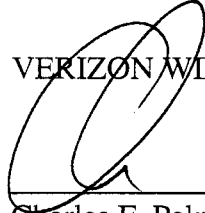
2. Staff Request for Production No. 1: Please provide the pertinent portions of the existing ICAs between BellSouth and ALLTEL Florida, Inc., GTC, Inc. d/b/a GT Com, Smart City Telecommunications, and LLC d/b/a Smart City Telecom responsive to Interrogatory No. 15.

Request for Clarification:

Verizon Wireless believes that Staff intended to refer to the ICAs between Verizon Wireless and ALLTEL Florida, Inc., GTC, Inc. d/b/a GT Com, Smart City Telecommunications, and LLC d/b/a Smart City Telecom responsive to Interrogatory No. 15. Verizon Wireless will respond to Request for Production No. 1 in this manner unless otherwise advised by Staff.

Respectfully submitted, this 1st day of March, 2006.

VERIZON WIRELESS



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CERTIFICATE OF SERVICE
Docket Nos. 050119-TP and 050125-TP

I HEREBY CERTIFY that a true and correct copy of Verizon Wireless' Request for Clarification of Interrogatory No. 15 Included in Staff's Second Set of Interrogatories to Verizon Wireless (Nos. 15-16) and Request for Production of Documents No. 1 Included in Staff's First Request for Production of Documents to Verizon Wireless (No. 1) has been served by Electronic Mail and U.S. mail this 1st day of March, 2006 to the following:

Florida Public Service Commission Jason Rojas 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850	Blooston Law Firm Benjamin H. Dickens, Esq. 2120 L Street, NW Suite 300 Washington, DC 20037
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