

**REDACTED**

4. In the event that you assert that any requested information is not available in the form requested, in your written response thereto, you should disclose the following:

- a. The form in which the requested information currently exists (identifying documents by title or description);
- b. The earliest dates, time period, and location that representatives of QCC may inspect your files, records or documents in which the information currently exists.

5. The Response to each discovery request provided should first restate the question asked and also identify the person(s) supplying the information.

6. Whenever you are instructed to state a date, amount, number or quantification, or percent of any kind, if such date, amount, number or quantification, or percent is unknown to you, state your best estimate of such date, amount, number or quantification, or percent or indicate that it is an estimate.

**INTERROGATORIES**

**Interrogatory No. 9.** Derek Canfield (QCC witness) Exhibits DAC-13 and DAC-14 identify and summarize QCC's records of Granite's billing to QCC for intrastate switched access in Florida.

a. Identify, explain and itemize any inaccuracies (if any) in the "Amount Billed" column of Exhibit DAC-13.

b. Identify, explain and itemize any inaccuracies (if any) in the "Amount Billed" column of Exhibit DAC-14.

**Interrogatory No. 10.** At page 59 of his Direct Testimony, witness Don Wood testifies that [BEGIN LAWYERS ONLY CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COM \_\_\_\_\_  
APA \_\_\_\_\_  
ECR \_\_\_\_\_  
QCC | \_\_\_\_\_  
RAD \_\_\_\_\_  
SRC \_\_\_\_\_  
ADM \_\_\_\_\_  
OPC \_\_\_\_\_  
CLK \_\_\_\_\_

REDACTED  
04325 JUN 29 02  
FPSC-COMMISSION CLERK

[REDACTED]

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[REDACTED]

[REDACTED] [END LAWYERS ONLY  
CONFIDENTIAL]

**Interrogatory No. 11.** At page 1 of his Direct Testimony, Don Wood testifies that he has performed cost analyses of new and existing services. Has Mr. Wood, or anyone else on behalf of Granite, performed a cost analysis regarding Granite's provision of switched access to QCC, AT&T and Sprint? If your answer is other than an unqualified "no," please fully explain the results of those analyses.

**Interrogatory No. 12.** At page 35 of his Direct Testimony, witness Don Wood states that the "number and location of carrier Points of Interconnection can have an impact of [sic] the cost incurred by each carrier when traffic, including but not limited to switched access traffic, is exchanged."

a. Is it Granite's contention that its cost of providing switched access differed as among IXCs QCC, AT&T and Sprint on this basis? If your answer is other than an unqualified "no," fully explain and support your response.

b. Has Mr. Wood, or anyone else on behalf of Granite, performed a cost analysis to support this statement. If your answer is other than an unqualified "no," please fully explain the results of those analyses.

c. Has Mr. Wood, or anyone else on behalf of Granite, performed any analysis of the number and location of the Points of Interconnection of QCC, AT&T and Sprint? If your answer is other than an unqualified "no," please fully explain the results that analysis.

d. Did Granite enter into the switched access agreements at issue in this case on the basis that its cost of providing switched access to the IXCs with whom it entered agreement was

**REQUESTS FOR ADMISSION**

**Request for Admission No. 1. [BEGIN LAWYERS ONLY CONFIDENTIAL]** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**END**

**LAWYERS ONLY CONFIDENTIAL]**

**Request for Admission No. 4.** Granite charged QCC Granite's Florida price list rate during all periods that is charged QCC for intrastate switched access in Florida.

**Request for Admission No. 5.** Granite charged QCC the "Billed Amounts" specified at the rates specified in Exhibits DAC-13 and DAC-14.

**Request for Admission No. 6.** Granite has no billing records contradicting the "Billed Amounts" specified in Exhibits DAC-13 and DAC-14.

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