

RAR

STATE OF FLORIDA

Commissioners:  
JOE GARCIA, CHAIRMAN  
J. TERRY DEASON  
SUSAN F. CLARK  
JULIA L. JOHNSON  
E. LEON JACOBS, JR.



DIVISION OF LEGAL SERVICES  
NOREEN S. DAVIS  
DIRECTOR  
(850) 413-6199

Public Service Commission

September 2, 1999

Mr. J. Andrew Bertron, Jr.  
Mr. J. Michael Huey  
Huey, Guilday & Tucker, P.A.  
Post Office Box 1794  
Tallahassee, Florida 32302

Re: Docket No. 990750-TP

Dear Mr. <sup>Andy</sup> Bertron:

Please find attached Staff's First Request for Production of Documents and Staff's First Set of Interrogatories to ITC^DeltaCom Communications, Inc. Pursuant to our conversation yesterday, staff is requesting expedited response to discovery. Please return the discovery within 20 days rather than 30 (plus five days for mailing). Please do not hesitate to call me if you have any questions.

Sincerely,

*Diana W. Caldwell*

Diana W. Caldwell  
Senior Attorney, Legal Services  
Division

DWC  
Attachments

- AFA \_\_\_\_\_
  - APP \_\_\_\_\_
  - CAF \_\_\_\_\_
  - CMU \_\_\_\_\_
  - CTR \_\_\_\_\_
  - EAG \_\_\_\_\_
  - LEG \_\_\_\_\_
  - MAS \_\_\_\_\_
  - OPC \_\_\_\_\_
  - PAI \_\_\_\_\_
  - SEC \_\_\_\_\_
  - WAW \_\_\_\_\_
  - OTH \_\_\_\_\_
- cc: All Parties of Record  
Division of Records and Reporting  
Division of Communications (Favors)

DOCUMENT NUMBER - DATE

10588 SEP-26

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by ITC^DeltaCom  
Communications, Inc. d/b/a  
ITC^DeltaCom for arbitration of  
certain unresolved issues in  
interconnection negotiations  
between ITC^DeltaCom and  
BellSouth Telecommunications,  
Inc.

DOCKET NO. 990750-TP

FILED: SEPTEMBER 2, 1999

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of Staff's First Request for Production of Documents (Nos. 1 - 14) have been served **VIA U.S. MAIL**, to J. Andrew Bertron, Jr., Esquire, Huey Law Firm, P.O. Box 1794, Tallahassee, Florida 32302, on behalf of ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom, this 2nd day of September, 1999, and that a true and correct copy thereof has been furnished by U.S. Mail to the following:

Nancy B. White, Esquire  
c/o Ms. Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Suite 400  
Tallahassee, FL 32301-1556

Ms. Nanette Edwards  
ITC^DeltaCom  
700 Boulevard South  
Suite 107  
Huntsville, AL 35802

CERTIFICATE OF SERVICE  
DOCKET NO. 990750-TP

Sutherland Asbill & Brennan LLP  
Mr. David I. Adelman  
Mr. Charles B. Jones  
999 Peachtree Street  
Atlanta, GA 30309-3996

Michael P. Goggin, Esquire  
150 West Flagler Street  
Suite 1910  
Miami, FL 33130

  
\_\_\_\_\_  
DIANA W. CALDWELL  
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION  
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