

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In Re:)
Petition for Arbitration of)
ITC^DeltaCom Communications, Inc.) Docket No. 990750-TP
With BellSouth Telecommunications, Inc.)
Pursuant to the Telecommunications)
Act of 1996)

**ITC^DELTA COM COMMUNICATIONS, INC. d/b/a ITC^DELTA COM'S
RESPONSES AND OBJECTIONS TO
STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 15-27)**

COMES NOW, ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom
("ITC^DeltaCom"), pursuant to the Rules of the Florida Public Service Commission and hereby
files its Responses to Staff's Second Request for Production of Documents (Nos. 15-27) as
follows:

15. Please provide any and all documents that support the response to Staff's Second
Set of Interrogatories Request No. 18.

Response: ITC^DeltaCom has no documents other than its existing interconnection
agreement on file with this Commission.

16. Please provide any and all documents that support the response to Staff's Second
Set of Interrogatories Request No. 19.

Response: See testimony and exhibits of Don Wood.

17. Please provide any and all documents that support the response to Staff's Second
Set of Interrogatories Request No. 20.

Response: See testimony of Don Wood.

AFA _____
APP _____
CAF _____
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SEC _____
WAW _____
OTH _____

DOCUMENT NUMBER-DATE

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18. Please provide any and all documents that support the response to Staff's Second Set of Interrogatories Request No. 23.

Response: See testimony of Don Wood.

19. Please provide any and all documents that support the response to Staff's Second Set of Interrogatories Request No. 24.

Response: See testimony of Don Wood.

20. Please provide any and all documents that support the response to Staff's Second Set of Interrogatories Request No. 25(a).

Response: There is no part (a) to Staff's Second Set of Interrogatories Request No. 25

21. Please provide any and all documents that support the response to Staff's Second Set of Interrogatories Request No. 25(b).

Response: There is no part (b) to Staff's Second Set of Interrogatories Request No. 25

22. Please provide any and all documents that support the response to Staff's Second Set of Interrogatories Request No. 26.

Response: Please see testimony of Don Wood.

23. Please provide any and all documents that support the response to Staff's Second Set of Interrogatories Request No. 27.

Response: Attached is the confidential draft exchanged during negotiations that revolve around this section.

24. Refer to page 4 of the Rebuttal Testimony of witness Thomas Hyde. Please provide any and all documents exchanged with BellSouth regarding the extended loop arrangement that ITC^DeltaCom refers to.

Response: BellSouth provided a Professional Services Agreement for which BellSouth required ITC^DeltaCom to sign a nondisclosure confidentiality agreement. This question is better directed to BellSouth. However, under the parties existing interconnection agreement there are provisions that require BellSouth to provide extended loops under that agreement.

25. On page 27, lines 3-5, of Mr. Rozycki's Rebuttal Testimony, he stated that he believed that BellSouth often takes apart the customer's existing bundled elements and reassembles them in a substandard manner. Please provide any and all documents that substantiate this claim.

Response: Please see testimony and exhibits of Tom Hyde.

26. On page 3, lines 5-8, of witness Thomas' Rebuttal Testimony, he stated that ITC^DeltaCom is extremely concerned that BellSouth is now indicating that it may not be technically feasible for ITC^DeltaCom to obtain ordering and provisioning services equal to that which BellSouth provides to itself or others. Please provide documents that substantiate witness Thomas' statement.

Response: As stated in witness Thomas' Rebuttal Testimony, the FCC has concluded that it is technically feasible for incumbent local exchange carriers, including BellSouth, to provide nondiscriminatory access to OSS for resale services and unbundled network elements. Based on

ITC^DeltaCom's experience with BellSouth's OSS, ITC^DeltaCom does not believe that it has received nondiscriminatory access. For example, this is evidenced by Confidential Exhibit MT-2, which is on file with the Commission. In addition, BellSouth would not agree in writing in the agreement to provide pre-ordering, ordering, provisioning and maintenance and repair equal to that which it provides to itself. BellSouth witness Pate confirms this unwillingness to provide nondiscriminatory access to OSS in his Direct Testimony when he states, "BellSouth is not obligated to provide ALECs with any additional OSS." These actions and statements cause ITC^DeltaCom great concern to its ability to compete on an equal footing in the Florida local exchange market.

27. For the following request, please refer to witness Hyde's Direct Testimony, at page 5, lines 1-9. Please provide any and all documents to support the allegation that when BellSouth loses a customer served through an IDLC arrangement, a conversion from IDLC to UDLC occurs.

Response: Please see testimony and exhibits of Tom Hyde.

Respectfully submitted, this 19 day of October, 1999.


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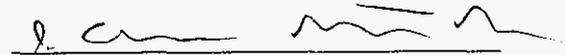
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished this
19 day of October, 1999 to the following:

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