

In re: Petition of Competitive Carriers for Commission Action to support local competition in BellSouth Telecommunications, Inc.'s territory

§ Docket Nos. 981834-TP and 990321-TL
§ (Consolidated)

In re: Petition of Rhythms Links, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Inc., and GTE Florida Inc., comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient collocation

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§ Filed: January 7, 2000

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OBJECTIONS AND RESPONSES OF COVAD COMMUNICATIONS COMPANY TO GTE FLORIDA INC.'S FIRST SET OF INTERROGATORIES

Pursuant to Rule 28-106.206 of the Florida Administrative Code, and Rule 1.340 of the Florida Rules of Civil Procedure, Covad Communications Company ("Covad") serves its objections and responses to GTE Florida Inc.'s First Set of Interrogatories ("First Set").

General Objections

1. Covad objects to these interrogatories to the extent they seek to impose obligations other than those imposed by the Florida Administrative Code or the Florida Rules of Civil Procedures.

2. Covad objects to these interrogatories to the extent they seek trade secrets and/or confidential proprietary information, or information that is protected from disclosure by privilege or immunity, including but not limited to, the attorney-client privilege and work product doctrine.

3. Covad objects to these interrogatories to the extent they seek information from any entity other than Covad Communications Company, information

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MAS 3 _____
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SEC 1 _____
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that is publicly available, or information within the possession custody or control of GTE Florida, Inc.

4. Covad objects to providing a privilege log as defined by these interrogatories. Covad agrees to comply with the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Rules of the Florida Public Service Commission regarding claims of privilege.

5. Covad's investigation of this matter is continuing. Covad, therefore, reserves the right to supplement its responses and to assert additional objections to these interrogatories, if necessary.

6. Covad incorporates each of these General Objections into its responses to individual interrogatories provided below.

Responses to Individual Interrogatories

INTERROGATORY NO. 1: At page 4, lines 16-19 of Covad witness Moscaritolo's Direct Testimony in this Docket, Mr. Moscaritolo states that "GTE Florida provides collocation space to Covad in a median interval of 184 calendar days in Florida, i.e., over 6 months." Please explain the factual basis for this statement, including explaining what event Covad believes triggers the start of the collocation provisioning interval and what event terminates the interval.

RESPONSE: Subject to and without waiver of its General Objections, Covad responds as follows:

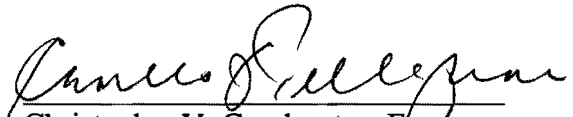
The referenced testimony relies upon data gathered by Covad regarding 23 applications for collocation submitted to GTE Florida, Inc. for central offices in the Tampa, Florida metropolitan area. The collocation interval consists of the sum of (1) the interval between the date of the submission of a collocation application by Covad and the date of the return of a price quote by GTE Florida, Inc., ("Application Interval"), and (2) the interval between the date of submission of the required deposit by Covad and the date that GTE Florida, Inc. delivered or intends to deliver the requested collocation space

("Provisioning Interval"). The collocation interval does not include the amount of time required by Covad to respond to the price quote provided by GTE Florida, Inc.

RESPONSE PROVIDED BY: Michael Moscaritolo
Expert Witness for Covad Communications Company

Dated: January 7, 2000

Respectfully submitted,

for 
Christopher V. Goodpastor, Esq.

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QUALIFIED REPRESENTATIVE
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via facsimile/U.S. Mail this 7th day of January, 2000 to the following:

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