

RECEIVED-FPSC

E. EARL EDENFIELD, JR.
General Attorney

00 JUN 22 PM 4: 32

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0763

RECORDS AND
REPORTING

June 22, 2000

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 990649-TP (UNEs)

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. served its First Request for Production of Documents and First Interrogatories to Rhythms Links, Incorporated.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

E. Earl Edenfield Jr.

E. Earl Edenfield, Jr.

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

- APP _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- LEG _____
- OPC _____
- PAI _____
- RGO _____
- SEC 1
- SER _____
- OTH _____

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07626 JUN 22 8

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
Docket No. 990649-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Federal Express this 22nd day of June, 2000 to the following:

Wayne D. Knight
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6216
Fax. No. (850) 413-6217

Joseph A. McGlothlin (+)
Vicki Gordon Kaufman (+)
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold,
& Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Attys. For FCCA
*Atty. for BlueStar

Marsha Rule (+)
AT&T Communications
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6364
Fax. No. (850) 425-6343

Jim Lamoureux (+)
AT&T Communications
1200 Peachtree Street, N.E.
Room 8068
Atlanta, Georgia 30309
Tel. No. (404) 810-4196
Fax. No. (404) 877-7648

Richard D. Melson (+)
Gabriel E. Nieto
Hopping Green Sams & Smith, P.A.
Post Office 6526
123 South Calhoun Street
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Atty. For MCI
Atty. for Rhythms Link
Atty. for ACI

Dulaney L. O'Roark
MCI Telecommunications Corporation
6 Concourse Parkway
Suite 600
Atlanta, GA 30328
Tel. No. (770) 284-5498
Fax. No. (770) 284-5488

Floyd Self
Norman H. Horton, Jr.
Messer, Caparello & Self
Post Office Drawer 1876
215 South Monroe Street, Suite 701
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Attys. for WorldCom
Atty. for NorthPoint

Terry Monroe
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036
Tel. No. (202) 296-6650
Fax. No. (202) 296-7585

Susan Huther
Rick Heapter
MGC Communications, Inc.
3301 Worth Buffalo Drive
Las Vegas, Nevada 89129
Tel. No. (702) 310-4272
Fax. No. (702) 310-5689

John Kerkorian (+)
MGC Communications
d/b/a Mpower Communications Corp.
Regional Vice President
Legal & Regulatory Affairs
Southeast Region
5607 Glenridge Drive, Suite 310
Atlanta, GA 30342
Tel. No. (404) 554-1000
Fax. No. (404) 554-0010

Jeremy Marcus (+)
Kristin Smith
Blumenfeld & Cohen
1625 Massachusetts Ave., Ste. 300
Washington, D.C. 20036
Tel. No. (202) 955-6300
Fax. No. (202) 955-6460

Kimberly Caswell (+)
GTE Florida Incorporated
One Tampa City Center
201 North Franklin Street
Tampa, Florida 33602
Tel. No. (813) 483-2617
Fax. No. (813) 204-8870

Karen M. Camechis (+)
Pennington, Moore, Wilkinson &
Dunbar, P.A.
215 South Monroe Street, 2nd Flr.
Tallahassee, Florida 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126

Carolyn Marek (+)
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, Tennessee 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405

Mark E. Buechele, Esquire
Supra Telecom
1311 Executive Center Drive
Koger Center - Ellis Building
Suite 200
Tallahassee, FL 32301-5027
Tel. No. (850) 402-0510
Fax. No. (850) 402-0522

Donna Canzano McNulty, Esq. (+)
MCI WorldCom, Inc.
325 John Knox Road
The Atrium Bldg., Suite 105
Tallahassee, FL 32303
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586

Michael A. Gross (+)
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
310 North Monroe Street
Tallahassee, FL 32301
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676

ACI Corp.
7337 S. Revere Parkway
Englewood, CO 80112
Tel. No. (303) 476-4200
Fax. No. (303) 476-4201

Florida Public Telecomm. Assoc.
Angela Green, General Counsel
125 South Gadsden Street
#200
Tallahassee, FL 32301-1525
Tel. No. (850) 222-5050
Fax. No. (850) 222-1355

Intermedia Communications, Inc.
Scott Sapperstein (+)
Sr. Policy Counsel
3625 Queen Palm Drive
Tampa, FL 33619-1309
Tel. No. (813) 829-4093
Fax. No. (813) 829-4923

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
215 South Monroe Street, Ste. 420
Tallahassee, FL 32301

Tel. No. (850) 681-6788
Fax. No. (850) 681-6515
Time Warner AxS of FL, L.P.
2301 Lucien Way
Suite 300
Maitland, FL 32751
Represented by Pennington Law Firm

Glenn Harris, Esq.
NorthPoint Communications, Inc.
222 Sutter Street
7th Floor
San Francisco, CA 94108
Tel. No. (415) 365-6095
Fax. No. (415) 403-4004
Email Fax. (503) 961-1314

Charles J. Rehwinkel (+)
1313 Blair Stone Road
Tallahassee, FL 32301
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777
Counsel for Sprint

John P. Fons (+)
Ausley & McMullen
Washington Square Building
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 224-9115
Fax. No. (850) 222-7560
Counsel for Sprint

Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway
Suite 3200
Atlanta, GA 30328
Tel. No. (770) 284-5500

Catherine F. Boone, Esq. (+)
Regional Counsel
Covad Communications Company
10 Glenlake Parkway
Suite 650
Atlanta, GA 30328-3495
Tel. No. (678) 579-8388
Fax. No. (678) 320-9433

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400
Tel. No. (850) 488-9330
Fax. No. (850) 488-4491

Eric J. Branfman (+)
Morton J. Posner (+)
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7500
Fax. No. (202) 424-7645
Represents Florida Digital Network, Inc.
Represents KMC, KMC II & KMC III

John McLaughlin
KMC Telecom. Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096
Tel. No. (770) 931-5260
Fax. No. (770) 638-6796

Betty Willis (+)
ALLTEL Communications
Services, Inc.
One Allied Drive
Little Rock, AR 72203-2177

J. Jeffry Wahlen (+)
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 425-5471
Fax. No. (850) 222-7560
Atty. for ALLTEL

Stephen P. Bowen
Blumenfeld & Cohen
4 Embarcadero Center
Suite 1170
San Francisco, CA 94111
Tel. No. (415) 394-7500
Fax. No. (415) 394-7505

Norton Cutler (+)
General Counsel
BlueStar Networks, Inc.
401 Church Street
24th Floor
Nashville, Tennessee 37201
Tel. No. (615) 346-3848
Fax. No. (615) 255-2102

Michael Bressman (+)
Associate General Counsel
401 Church Street
24th Floor
Nashville, Tennessee 37201
Tel. No. (615) 346-6660
Fax. No. (615) 255-2102

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
2145 Delta Boulevard, Suite 200
Tallahassee, FL 32303

George S. Ford (+)
Chief Economist
Z-Tel Communications, Inc.
601 South Harbour Island Blvd.
Tampa, FL 33602
Tel. No. (813) 233-4630
Fax. No. (813) 233-4620
gford@z-tel.com

Jonathan E. Canis
Michael B. Hazzard
Kelley Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, DC 20036
Tel. No. (202) 955-9600
Fax. No. (202) 955-9792
jacanis@kelleydrye.com
mhazzard@kelleydrye.com
Counsel for Z-Tel Communications, Inc.

Rodney L. Joyce
Shook, Hardy & Bacon, LLP
600 14th Street, N.W., Suite 800
Washington, D.C. 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
rjoyce@shb.com
Represents Network Access Solutions

Jon C. Moyle, Jr., Esq.
Cathy M. Sellers, Esq.
Moyle, Flanigan, Katz, Kolins,
Raymond & Sheehan, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828
Fax. No. (850) 681-8788
Attys. for Global NAPs
jmoylejr@moylelaw.com
csellers@moylelaw.com

Russell M. Blau
Marc B. Rothschild (+)
Robert Ridings
Swidler Berlin Shereff Friedman
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7755
Fax. No. (202) 424-7643
Attys. for Broadslate Networks, Inc.
Attys. for @link Network, Inc.
Attys. for Network Telephone
Attys. for Cleartel Comm.

John Spilman
Director Regulatory Affairs and
Industry Relations
Broadslate Networks, Inc.
675 Peter Jefferson Parkway
Suite 310
Charlottesville, VA 22911
Tel. No. (804) 220-7606
Fax. No. (804) 220-7701

Constance L. Kirkendall
Regulatory Manager
@link Network, Inc.
2220 Campbell Creek Blvd.
Suite 110
Richardson, TX 75082-4420
Tel. No. (972) 367-1700
Fax. No. (972) 367-1775

Gary Cohen (+)
Blumfeld & Cohen
1625 Massachusetts Ave., N.W.
Suite 320
Washington, D.C. 20036
Represents Rhythms Links, Inc.

Hope G. Colantonio
Legal & Regulatory Manager
Cleartel Communications, Inc.
1255 22nd Street N.W., 6th Floor
Washington, D.C. 20037
Tel. No. (202) 715-1300



Bennett L. Ross (Red)

(+) Signed Protective Agreement