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June 27, 2000

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RECORDS AND REPORTING

**Via Federal Express**

Ms. Blanca S. Bayo, Director  
Division of Records & Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
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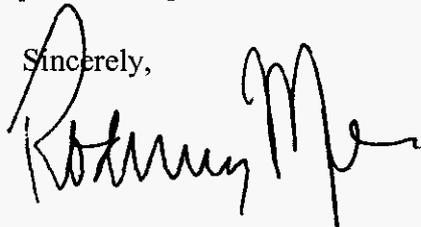
Re: Docket No. 990649-TP (Investigation into Pricing of Unbundled Network Elements)

Dear Ms. Bayo:

Enclosed for filing is an original and 15 copies of "Response of Network Access Solutions Corporation to BellSouth Telecommunications, Inc.'s First Interrogatories and Document Production Requests." Service has been made as indicated on the Certificate of Service.

Please stamp the extra copy to indicate the filing date and return the stamped copy to me in the enclosed, self-addressed and prepaid envelope.

Sincerely,



Rodney L. Joyce  
Counsel for Network Access  
Solutions Corporation

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP Delella
- COM 5
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
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Enclosures

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BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: )  
 )  
Investigation Into Pricing of Unbundled ) Docket No. 990649-TP  
Network Elements ) Filed June 21, 2000

**RESPONSE OF NETWORK ACCESS SOLUTIONS CORPORATION  
TO BELL SOUTH TELECOMMUNICATIONS, INC.'S  
FIRST INTERROGATORIES AND DOCUMENT PRODUCTION REQUESTS**

Pursuant to Rule 28-106.206 of the Florida Administrative Code and Rule 1.340, 1.350 and 1.280(b) of the Florida Rules of Civil Procedure, Network Access Solutions Corp. ("NAS") responds to BellSouth Telecommunications, Inc.'s First Interrogatories ("BellSouth's Interrogatories") and BellSouth's Telecommunications, Inc.'s First Request for Production of Documents ("BellSouth's Production Requests").

**Objections**

1. NAS objects to each of BellSouth's Interrogatories and BellSouth's Production Requests because they seek information which is irrelevant to the subject matter of this proceeding.

2. NAS objects to each of BellSouth's Interrogatories and BellSouth's Production Requests because they seek information that is not reasonably calculated to lead to the discovery of admissible evidence.

3. NAS objects to each of BellSouth's Interrogatories and BellSouth's Production Requests because they are vague, ambiguous, overly broad, imprecise, and utilize terms

that are subject to multiple interpretations but are not properly defined or explained for purposes of BellSouth's Interrogatories and BellSouth's Production Requests.

4. NAS objects to each of BellSouth's Interrogatories and BellSouth's Production Requests because they require the production of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secrets.

5. NAS objects to each of BellSouth's Interrogatories, instructions, and definitions, and each of BellSouth's Production Requests, instructions, and definitions because they seek to impose obligations on NAS that exceed the requirements of applicable law.

Notwithstanding the foregoing objections and without waiving those objections, NAS responds to BellSouth's Interrogatories and BellSouth's Production Requests as follows:

**Response to Interrogatories**

BellSouth No. 1: Identify all persons participating in the preparation of the answers to these Interrogatories or supplying information used in connection therewith and describe the extent of each person's participation, including any information that person provided.

**Response.** Donald H. Sussman, Director of Regulatory Affairs, Network Access Solutions Corporation, 100 Carpenter Drive, Sterling, VA 20164.

BellSouth No. 2: Does NAS provide telephone exchange service in the State of Florida?

**Response.** NAS does not presently provide any telecommunications service in Florida. Moreover, the telecommunications service that NAS is preparing to provide in Florida is not telephone exchange service.

BellSouth No. 3: If the answer to the foregoing Interrogatory is in the affirmative, please identify all counties in Florida where NAS currently provides telephone exchange service, state the date when NAS began providing such service, and describe with particularity the network NAS uses to provide such service in Florida.

**Response.** Not applicable because of Response to No. 2 above.

BellSouth No. 4: Does NAS own or operate any switches that it uses to provide telephone exchange service in the State of Florida?

**Response.** Not applicable because of Response to No. 2 above.

BellSouth No. 5: If the answer to the foregoing Interrogatory is in the affirmative for each switch owned or operated by NAS to provide telephone exchange service in the State of Florida, please:

- (a) identify the location of each such switch;
- (b) describe the type of switch (e.g., Digital, Electronic, ATM);
- (c) state the date when the switch was placed; and
- (d) state the planned retirement date of each such switch.

**Response.** Not applicable because of Response to No. 2 above.

BellSouth No. 6: If the answer to Interrogatory Number 4 is in the affirmative, please provide the total investment of switches (by type of switch if available) that NAS owns or operates to provide telephone exchange service in the State of Florida.

**Response.** Not applicable because of Response to No. 2 above.

BellSouth No. 7: Please state the economic lives or useful lives used by NAS for depreciation purposes for the switches it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of switch involved (e.g., Digital, Electronic, ATM, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by NAS for depreciation purposes for the switches it owns or operates to provide telephone exchange service in Florida.

**Response.** Not applicable because of Response to No. 2 above.

BellSouth No. 8. Does NAS own or operate any cable that it uses to provide telephone exchange service in the State of Florida?

**Response.** Not applicable because of Response to No. 2 above.

BellSouth No. 9: If the answer to the foregoing Interrogatory is in the affirmative, please:

- (a) state the cable route miles currently in place;
- (b) describe the type of cable in place (e.g., Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid Fiber/Coaxial Cable, etc.);
- (c) provide the total investment in cable (by type of cable, if available) that NAS owns or operates to provide telephone exchange service in the State of Florida.

**Response.** Not applicable because of Response to No. 2 above.

BellSouth No. 10: Please state the economic lives or useful lives used by NAS for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of cable involved (e.g., Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid Fiber/Coaxial Cable, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by NAS for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida.

**Response.** Not applicable because of Response to No. 2 above.

BellSouth No. 11: Does NAS own or operate any digital circuit equipment that it uses to provide telephone exchange service in the State of Florida?

**Response.** Not applicable because of Response to No. 2 above.

BellSouth No. 12: If the answer to the foregoing Interrogatory is in the affirmative, please:

- (a) describe the type of digital circuit equipment in place (e.g., carrier, optical, amplification, signaling);
- (b) provide the total investment in digital circuit equipment (by type of equipment, if available) that NAS owns or operates to provide telephone exchange service in the State of Florida.

**Response.** Not applicable because of Response to No. 2 above.

BellSouth No. 13: Please state the economic lives or useful lives used by NAS for depreciation purposes for the digital circuit equipment it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of digital circuit equipment involved (e.g., carrier, optical, amplification, signaling). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful

lives used by NAS for depreciation purposes for the digital circuit equipment it uses or operates to provide telephone exchange service in Florida.

**Response.** Not applicable because of Response to No. 2 above.

BellSouth No. 14: Does NAS provide interLATA service in the State of Florida?

**Response.** No.

BellSouth No. 15: If the answer to the foregoing Interrogatory is in the affirmative, please identify all counties in Florida where NAS currently provides interLATA service, state the date when NAS began providing such service, and describe with particularity the network NAS uses to provide such service in Florida.

**Response.** Not applicable because of Response to No. 14 above.

BellSouth No. 16: Does NAS own or operate any switches that it uses to provide interLATA service in the State of Florida?

**Response.** Not applicable because of Response to No. 14 above.

BellSouth No. 17: If the answer to the foregoing Interrogatory is the affirmative, for each switch owned or operated by NAS to provide interLATA service in the State of Florida, please:

- (a) identify the location of each such switch;
- (b) describe the type of switch (e.g., Digital, Electronic, ATM);
- (c) state the date when the switch was placed; and
- (d) state the planned retirement date of each such switch.

**Response.** Not applicable because of Response to No. 14 above.

BellSouth No. 18: If the answer to Interrogatory No. 16 is in the affirmative, please provide the total investment of switches (by type of switch, if available), that NAS owns or operates to provide interLATA service in the State of Florida June 26, 2000.

**Response.** Not applicable because of Response to No. 14 above.

BellSouth No. 19: Please state the economic lives or useful lives used by NAS for depreciation purposes for the switches it owns or operates to provide interLATA service in Florida, including the extent to which such lives vary depending upon the type of switch involved (e.g.,

Digital, Electronic, ATM, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by NAS for depreciation purposes for the switches it owns or operates to provide interLATA service in Florida.

**Response.** Not applicable because of Response to No. 14 above.

BellSouth No. 20: Does NAS own or operate any cable that it uses to provide interLATA service in the State of Florida?

**Response.** Not applicable because of Response to No. 14 above.

BellSouth No. 21: If the answer to the foregoing Interrogatory is in the affirmative, please:

- (a) state the cable route miles currently in place;
- (b) describe the type of cable in place (e.g., Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid Fiber/Coaxial Cable, etc.);
- (c) provide the total investment in cable (by type of cable, if available) that NAS owns or operates to provide interLATA service in the State of Florida.

**Response.** Not applicable because of Response to No. 14 above.

BellSouth No. 22: Please state the economic lives or useful lives used by NAS used by NAS for depreciation purposes for the cable it owns or operates to provide interLATA service in Florida, including the extent to which such lives vary depending upon the type of cable involved (e.g., Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid Fiber/Coaxial Cable, etc.). In answering this Interrogatory, please identify all document referring or relating to the economic lives or useful lives used by NAS for depreciation purposes for the cable it owns or operates to provide interLATA service in Florida.

**Response.** Not applicable because of Response to No. 14 above.

BellSouth No. 23: Does NAS own or operate any digital circuit equipment that it uses to provide interLATA service in the State of Florida?

**Response.** Not applicable because of Response to No. 14 above.

BellSouth No. 24: If the answer to the foregoing Interrogatory is in the affirmative, please:

- (a) describe the type of digital circuit equipment in place (e.g., carrier, optical, amplification, signaling);
- (b) provide the total investment in digital circuit equipment (by type of equipment, if available) that NAS owns or operates to provide interLATA service in the State of Florida.

**Response.** Not applicable because of Response to No. 14 above.

BellSouth No. 25: Please state the economic lives or useful lives used by NAS for depreciation purposes for the digital circuit equipment it owns or operates to provide interLATA service in Florida, including the extent to which such lives vary depending upon the type of digital circuit equipment involved. In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by NAS for depreciation purposes for the digital circuit equipment it owns or operates to provide interLATA service in Florida.

**Response.** Not applicable because of Response to No. 14 above.

BellSouth No. 26: Does NAS currently offer or plan to offer fixed wireless service to provide telephone exchange service or interLATA service in Florida?

**Response.** No.

BellSouth No. 27: If the answer to the foregoing Interrogatory is in the affirmative, please provide the economic lives or useful lives of the fixed wireless equipment (based on the classification of plant in NAS's accounting records) which NAS uses or expects to use to provide such service in Florida. In answering this Interrogatory, please identify all documents referring or relating to such economic lives or useful lives.

**Response.** Not applicable because of Response to No. 26 above.

BellSouth No. 28: Does NAS currently provide or plan to provide telephone exchange service or interLATA service in Florida using cable television plant or equipment?

**Response.** No.

BellSouth No. 29: If the answer to the foregoing Interrogatory is in the affirmative, please provide the economic lives or useful lives of the cable television plant or equipment (based on the classification of plant in NAS's accounting records) which NAS uses or expects to use to

provide such service in Florida. In answering this Interrogatory, please identify all documents referring or relating to such economic lives or useful lives.

**Response.** Not applicable because of Response to No. 28 above.

**Response to Production Requests**

BellSouth P.R. No. 1: Produce all document identified in response to BellSouth's First Set of Interrogatories.

**Response.** No documents are identified in response to BellSouth's First Set of Interrogatories.

BellSouth P.R. No. 2: Produce all documents furnished or provided by NAS or on NAS's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by NAS for depreciation purposes with the switches, cable, and digital circuit equipment NAS uses to provide telephone exchange service or interLATA service in Florida.

**Response.** There are none.

BellSouth P.R. No. 3: Produce all documents furnished or provided by NAS or on NAS's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by NAS for depreciation purposes for fixed wireless equipment NAS uses to provide telephone exchange service or interLATA service in Florida.

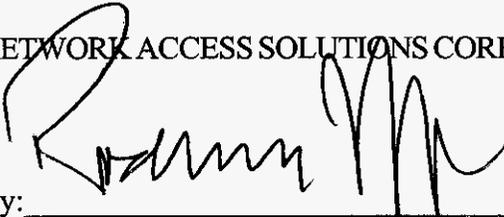
**Response.** There are none.

BellSouth P.R. No. 4: Produce all documents furnished or provided by NAS or on NAS's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by NAS for depreciation purposes for cable television plant or equipment NAS uses to provide telephone exchange service or interLATA service in Florida.

**Response.** There are none.

Respectfully submitted,

NETWORK ACCESS SOLUTIONS CORPORATION



By: \_\_\_\_\_

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Dated: June 27, 2000

VERIFICATION

Commonwealth of Virginia                    )  
  )  ss  
County of Loudoun                            )

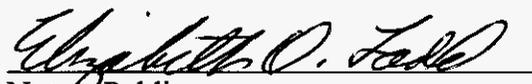
I hereby state that the answers provided in Docket No. 990649-TP in response to “BellSouth Telecommunications, Inc.’s First Interrogatories” and “BellSouth Telecommunications, Inc.’s First Document Production Requests” are true and correct to the best of my information and belief.

Dated this 27 day of June, 2000.



Donald H. Sussman

Sworn to and subscribed before me this 27 day of June, 2000.



Notary Public  
Commonwealth of Virginia

My commission expires: August 31, 2000

CERTIFICATE OF SERVICE

I hereby certify that the "Response of Network Access Solutions Corporation to BellSouth Telecommunications, Inc.'s First Interrogatories and Document Production Requests" was sent by overnight delivery on June 27, 2000 to E. Earl Edenfield, Jr., Nancy B. White, and Bennett L. Ross of BellSouth at the addresses listed below and that a copy of this Response was sent by U.S. Mail on June 27, 2000 to the other parties listed below.

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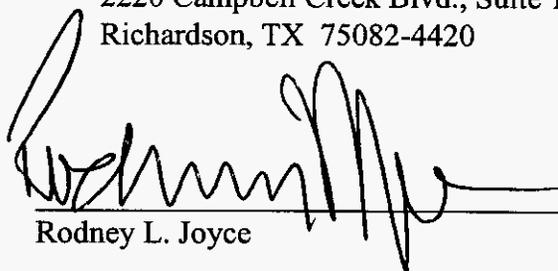
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