

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

RECORDS AND  
REPORTING

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In re: Investigation Into )  
Pricing Of Unbundled Network )  
Elements )

Docket No. 990649-TP

Filed: June 28, 2000

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INTERMEDIA COMMUNICATIONS INC.'S OBJECTIONS TO  
BELL SOUTH TELECOMMUNICATIONS, INC.'S  
FIRST SET OF INTERROGATORIES

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INTERMEDIA COMMUNICATIONS INC. ("Intermedia"), through its undersigned  
counsel, submits its objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set  
of Interrogatories ("Interrogatories").<sup>1</sup>

PRELIMINARY

The federal Telecommunications Act of 1996 (the "1996 Act") requires the incumbent  
local exchange carriers ("ILECs") to open their monopoly networks by, among other things,

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP Delgado
- COM 5
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- LEG 2
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- RGO \_\_\_\_\_
- SEC 1
- SER \_\_\_\_\_
- OTH \_\_\_\_\_

Intermedia is a large, multistate corporation with employees and records located in many different  
locations in Florida and other states. In the course of its business, Intermedia creates numerous documents  
that may not be subject to state or federal record retention policies. These documents are kept in numerous  
locations that are frequently moved from site to site as employees change jobs or as the business is  
reorganized. Therefore, although Intermedia has extensively searched its records in response to discovery  
requests in this proceeding, it is possible that not every document or information has been identified in  
response to these requests. In the event additional information and/or documents should come to light  
subsequent to the filing of Intermedia's responses to discovery requests, Intermedia will provide such  
additional information and/or documents, as appropriate.

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providing access to piece parts of their facilities, so-called unbundled network elements ("UNEs"). Under the Federal Communications Commission's ("FCC") rules, a state commission must set the price for UNEs based on the element's forward-looking Total Element Long Run Incremental Cost ("TELRIC").

In determining the appropriate prices for interconnection and UNEs, it is the ILECs who must show that their prices for interconnection and UNEs are based on forward-looking incremental costs. It is the ILECs' costs—not the costs of the new entrants seeking access to the ILECs' networks—which are relevant for purposes of this exercise. The burden clearly is on the ILECs to demonstrate compliance with the unbundling and pricing standards of the 1996 Act.

To the extent, therefore, that BellSouth improperly seeks to shift the burden in this proceeding to the new entrants by, among other things, inquiring into the new entrants' costs, business plans, investments, and types of services offered, BellSouth runs afoul of applicable law. This the Commission should not condone.

### **GENERAL OBJECTIONS**

1. Intermedia objects to BellSouth's Interrogatories to the extent they are overly broad, unduly burdensome, oppressive, and not permitted by the applicable discovery rules.

2. Intermedia objects to BellSouth's Interrogatories to the extent they seek information that is irrelevant to the subject matter of this proceeding or is not reasonably calculated to lead to the discovery of admissible evidence.

3. Intermedia objects to BellSouth's Interrogatories insofar as they are vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of the Interrogatories.

4. Intermedia objects to BellSouth's Interrogatories insofar as they require the production of information that is already publicly available and to which BellSouth has easy access.

5. Intermedia objects to BellSouth's Interrogatories to the extent they require the production of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret.

6. Intermedia objects to BellSouth's Interrogatories, instructions, and definitions, insofar as they seek to impose obligations on Intermedia that exceed the requirements of applicable law.

7. Intermedia objects to BellSouth's Interrogatories to the extent they seek the production of information that is not generally maintained by Intermedia in the ordinary course of business.

8. Intermedia objects to BellSouth's Interrogatories insofar as they impose unreasonable expense on Intermedia or are excessively time-consuming.

### **SPECIFIC OBJECTIONS**

Does ICI provide telephone exchange service in the State of Florida?

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonable calculated to lead to the discovery of admissible evidence.

3. If the answer to the foregoing Interrogatory is in the affirmative, please identify all counties in Florida where ICI currently provides telephone exchange service, state the date when ICI began providing such service, and describe with particularity the network ICI uses to

provide such service in Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonable calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

4. Does ICI own or operate any switches that it uses to provide telephone exchange service in the State of Florida?

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonable calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

5. If the answer to the foregoing Interrogatory is in the affirmative, for each switch owned or operated by ICI to provide telephone exchange service in the State of Florida, please:

identify the location of each such switch;

describe the type of switch (e.g., Digital Electronic, ATM);

state the date when the switch was placed; and

state the planned retirement date of each such switch

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonable calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

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 ICI owns or operates to provide telephone exchange service in the State of Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

7. Please state the economic lives or useful lives used by ICI 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 ICI for depreciation purposes for the switches it owns or operates to provide telephone exchange service in Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

8. Does ICI own or operate any cable that it uses to provide telephone exchange service in the State of Florida?

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

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 ICI owns or operates to provide telephone exchange service in the State of Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

10. Please state the economic lives or useful lives used by ICI 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 ICI for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects

to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

11. Does ICI own or operate any digital circuit equipment that it uses to provide telephone exchange service in the State of Florida?

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

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 ICI owns or operates to provide telephone exchange service in the State of Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects



to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

13. Please state the economic lives or useful lives used by ICI 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 ICI for depreciation purposes for the digital circuit equipment it owns or operates to provide telephone exchange service in Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

Does ICI provide interLATA service in the State of Florida?

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects

to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

15. If the answer to the foregoing Interrogatory is in the affirmative, please identify all counties in Florida where ICI currently provides interLATA service, state the date when ICI began providing such service, and describe with particularity the network ICI uses to provide such service in Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

16. Does ICI own or operate any switches that it uses to provide interLATA service in the State of Florida?

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

17. If the answer to the foregoing Interrogatory is in the affirmative, for each switch owned or operated by ICI 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:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

18. If the answer to Interrogatory number 16 is in the affirmative, please provide the total investment of switches (by type of switch, if available) that ICI owns or operates to provide interLATA service in the State of Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and

not permitted by applicable discovery rules.

19. Please state the economic lives or useful lives used by ICI 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 ICI for depreciation purposes for the switches it owns or operates to provide interLATA service in Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

20. Does ICI own or operate any cable that it uses to provide interLATA service in the State of Florida?

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and

not permitted by applicable discovery rules.

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.); and
  - (c) provide the total investment in cable (by type of cable, if available) that ICI owns or operates to provide interLATA service in the State of Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

22. Please state the economic lives or useful lives used by ICI 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 documents referring or relating to the economic lives or useful lives used by ICI for depreciation purposes for the cable it owns or operates to provide interLATA service in Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it

seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

23. Does ICI own or operate any digital circuit equipment that it uses to provide interLATA service in the State of Florida?

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

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); and
  - (b) provide the total investment in digital circuit equipment (by type of equipment, if available) that ICI owns or operates to provide interLATA service in the State of Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it

seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

25. Please state the economic lives or useful lives used by ICI 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 ICI for depreciation purposes for the digital circuit equipment it owns or operates to provide interLATA service in Florida.

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

26. Does ICI currently offer or plan to offer fixed wireless service to provide telephone exchange service or interLATA service in Florida?

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it

seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

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 ICI's accounting records) which ICI 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:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

28. Does ICI currently provide or plan to provide telephone exchange service or interLATA service in Florida using cable television plant or equipment?

**RESPONSE:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonably



calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

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 ICI's accounting records) which ICI 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:** OBJECTION. Intermedia objects to this Interrogatory to the extent it seeks information that is irrelevant to the subject matter of this proceeding and is not reasonable calculated to lead to the discovery of admissible evidence. Intermedia further objects to this Interrogatory to the extent it requires the release of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secret. Additionally, Intermedia objects to this Interrogatory on the grounds that it is unduly burdensome, oppressive, overly broad, and not permitted by applicable discovery rules.

Respectfully submitted this 28<sup>th</sup> day of June, 2000.

**INTERMEDIA COMMUNICATIONS INC.**

By: Joseph A. McElathen

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**ITS ATTORNEYS**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was hand delivered to BellSouth c/o Nancy Sims, faxed to GTE c/o Kimberly Caswell and sent via first-class mail on this 28<sup>th</sup> day of June, 2000 to the following parties:

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