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ORIGINAL

NEW YORK OFFICE
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June 28, 2000

VIA FEDERAL EXPRESS

Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

RECEIVED-FPSC
00 JUN 29 AM 11:36
RECORDS AND REPORTING

Re: Broadslate Networks of Florida, Inc.'s Response to BellSouth's First Set of Interrogatories and First Request for Production of Documents in Docket No. 990649-TP

Dear Ms. Bayo:

Enclosed please find one original and fifteen copies of Broadslate Networks of Florida, Inc.'s Response to BellSouth's First Set of Interrogatories and First Request for Production of Documents in Docket No. 990649-TP. Please date stamp and return the extra copy to us in the enclosed self addressed, postage paid envelope.

Please feel free to contact me if you have any questions or require further information.

Sincerely,

Marc Rothschild

Marc B. Rothschild
Counsel for Broadslate Networks of Florida, Inc.

Enclosures

cc: John Spilman

- APP _____
- CAF _____
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00 JUN 29 AM 10:08
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07923 JUN 29 8
FPSC-RECORDS/REPORTING

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

ORIGINAL

In re: Investigation into Pricing of)
Unbundled Network Elements)
_____)

Docket No. 990649-TP

Filed: June 28, 2000

**BROADSLATE NETWORKS OF FLORIDA, INC.'S
RESPONSES AND OBJECTIONS TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Broadslate Networks of Florida, Inc. ("Broadslate"), pursuant to Rule 28-1-6.206 of the Florida Administrative Code and Rules 1.350 and 1.280 of the Florida Rules of Civil Procedure, hereby submits the following Responses and Objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Request for Production of Documents to Broadslate Networks of Florida, Inc.

GENERAL OBJECTIONS

1. Broadslate objects to each request to the extent that any response would require the inclusion of information protected by the attorney-client privilege, the work product doctrine, the joint defense privilege or any other discovery privilege recognized under the Florida Rules of Civil Procedure or other applicable Florida law.

2. Broadslate objects to each request to the extent it seeks disclosure of trade secrets, confidential, or competitively confidential information. Broadslate will only produce such information if required by law and upon the execution of an acceptable Confidentiality Agreement and/or Protective Order providing, among other things, that such information shall be used solely for purposes of these proceedings, and that access and distribution of such information will be strictly limited to those needing access for the purposes of these proceedings.

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3. Broadslate objects to BellSouth's instructions as unduly burdensome and overly broad because they appear to require Broadslate to provide more information than might otherwise be required by law. Broadslate will perform only those obligations required under Florida law related to the identification of privileged information.

4. Broadslate objects to BellSouth data requests to the extent they seek information or documents that are not relevant to the subject matter of this proceeding and are not reasonably calculated to lead to the discovery of admissible evidence.

5. Broadslate objects to the definition of "Broadslate" to the extent that the definition seeks to impose an obligation on Broadslate to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome and not permitted by applicable discovery rules. Without waiver of its general objections, and subject to other specific objections, responses will be provided on behalf of Broadslate Networks of Florida, Inc., which is the ALEC certificated to provide regulated telecommunications services in Florida and which is a party to this docket.

6. Broadslate's specific objections and responses are set forth on the following pages.

INTERROGATORIES

Subject to, and without waiver of, the foregoing general objections, Broadslate enters the following responses to BellSouth's request for the production of documents:

Request No. 1:

Produce all documents identified in response to BellSouth's First Set of Interrogatories.

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to this interrogatory because the request is unduly burdensome and overly broad, and because the request seeks confidential information.

Request No. 2:

Produce all documents furnished or provided by Broadslate or on Broadslate's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by Broadslate for depreciation purposes for the switches, cable, and digital circuit equipment Broadslate uses to provide telephone exchange service or interLATA service in Florida.

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to this interrogatory because the request is unduly burdensome and overly broad, and because the request seeks confidential information.

Request No. 3:

Produce all documents furnished or provided by Broadslate or on Broadslate's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by Broadslate for depreciation purposes for fixed wireless equipment Broadslate uses to provide telephone exchange service or interLATA service in Florida.

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to this interrogatory because the request is unduly burdensome and overly broad, and because the request seeks confidential information.

Request No. 4:

Produce all documents furnished or provided by Broadslate or on Broadslate's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by Broadslate for depreciation purposes for cable television plant or equipment Broadslate uses to provide telephone exchange service or interLATA service in Florida.

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible

evidence. Furthermore, Broadslate objects to this interrogatory because the request is unduly burdensome and overly broad, and because the request seeks confidential information.

Respectfully submitted the 28th day of June, 2000.



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Counsel for Broadslate Networks
of Florida, Inc.

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into Pricing of)
Unbundled Network Elements)
_____)

Docket No. 990649-TP

Filed: June 28, 2000

**BROADSLATE NETWORKS OF FLORIDA, INC.'S
RESPONSES AND OBJECTIONS TO BELL SOUTH
TELECOMMUNICATIONS, INC.'S
FIRST SET OF INTERROGATORIES**

Broadslate Networks of Florida, Inc. ("Broadslate"), pursuant to Rule 28-106.206 of the Florida Administrative Code and Rules 1.340 and 1.280(b) of the Florida Rules of Civil Procedure, hereby submits the following Responses and Objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories to Broadslate Networks of Florida, Inc.

GENERAL OBJECTIONS

1. Broadslate objects to each interrogatory to the extent that any response would require the inclusion of information protected by the attorney-client privilege, the work product doctrine, the joint defense privilege or any other discovery privilege recognized under the Florida Rules of Civil Procedure or other applicable Florida law.

2. Broadslate objects to each interrogatory to the extent it seeks disclosure of trade secrets, confidential, or competitively confidential information. Broadslate will only produce such information if required by law and upon the execution of an acceptable Confidentiality Agreement and/or Protective Order providing, among other things, that such information shall be used solely for purposes of these proceedings, and that access and distribution of such information will be strictly limited to those needing access for the purposes of these proceedings.

3. Broadslate objects to BellSouth's instructions as unduly burdensome and overly broad because they appear to require Broadslate to provide more information than might otherwise be required by law. Broadslate will perform only those obligations required under Florida law related to the identification of privileged information.

4. Broadslate objects to BellSouth data requests to the extent they seek information or documents that are not relevant to the subject matter of this proceeding and are not reasonably calculated to lead to the discovery of admissible evidence.

5. Broadslate objects to the definition of "Broadslate" to the extent that the definition seeks to impose an obligation on Broadslate to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome and not permitted by applicable discovery rules. Without waiver of its general objections, and subject to other specific objections, responses will be provided on behalf of Broadslate Networks of Florida, Inc., which is the ALEC certificated to provide regulated telecommunications services in Florida and which is a party to this docket.

6. Broadslate's specific objections and responses are set forth on the following pages.

INTERROGATORIES

Subject to, and without waiver of, the foregoing general objections, Broadslate enters the following responses to BellSouth's interrogatories:

Interrogatory 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:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 2:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 3:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Additionally, Broadslate objects to this interrogatory because the request is unduly burdensome and overly broad.

Interrogatory No. 4:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 5:

If the answer to the foregoing Interrogatory is in the affirmative, for each switch owned or operated by Broadslate 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:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to this interrogatory because it seeks confidential information.

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to this interrogatory because it seeks confidential information.

Interrogatory No. 7:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to this interrogatory because the request is unduly burdensome and overly broad, and because the request seeks confidential information.

Interrogatory No. 8:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory 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/Coaxial Cable, etc.);

- C. provide the total investment in cable (by type of cable, if available) that Broadslate owns or operates to provide telephone exchange service in the State of Florida.

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to the request because it is unduly burdensome and overly broad, and because the request seeks confidential information.

Interrogatory No. 10:

Please state the economic lives or useful lives used by Broadslate 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/Coaxial Cable, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by Broadslate for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida.

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 11:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory 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 Broadslate owns or operates to provide telephone exchange service in the State of Florida

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 13:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 14:

Does Broadslate provide interLATA service in the State of Florida?

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 15:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to the interrogatory because the request is unduly burdensome and overly broad.

Interrogatory No. 16:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 17:

If the answer to the foregoing is in the affirmative, for each switch owned or operated by Broadslate 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:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 18:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Furthermore, Broadslate objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 19:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 20:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 21:

If the answering 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/Coaxial Cable, etc.);
- C. provide the total investment in cable (by type of cable, if available) that Broadslate owns or operates to provide telephone exchange service in the State of Florida.

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 22:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 23:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 24:

If the answer to the foregoing Interrogatory is in the affirmative, please:

- A. describe the 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 Broadslate owns or operates to provide interLATA service in the State of Florida.

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 25:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Broadslate objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 26:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory 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 (bases on the classification of plant in Broadslate's accounting records) which Broadslate 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:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Furthermore, Broadslate objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 28:

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

Response:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory 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 (bases on the classification of plant in Broadslate's accounting records) which Broadslate 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:

Broadslate objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Furthermore, Broadslate objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Respectfully submitted this 28th day of June, 2000.



Marc B. Rothschild
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Counsel for Broadslate Networks
of Florida, Inc.

CERTIFICATE OF SERVICE

I, Robert Ridings, HEREBY CERTIFY that on the 28th day of June, 2000, a copy of the foregoing Response and Objections of Broadslate Networks of Florida, Inc. in Docket No. 990649-TP was served, via first-class mail, on the following parties:

@link Networks, Inc.
Constance Kirkendall
2220 Campbell Creek Blvd., Suite 110
Richardson, TX 75082-4420

ACI Corp.
7337 S. Revere Parkway
Englewood, CO 80112
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ALLTEL Communications Services, Inc.
One Allied Drive
Little Rock, AR 72203-2177
Phone: (501) 905-7085

AT&T Communications of the Southern States, Inc.
Ms. Tracy Hatch
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549

Ausley Law Firm
Jeffrey Wahlen
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Tallahassee, FL 32302

BellSouth Telecommunications, Inc.
Ms. Nancy B. White
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Tallahassee, FL 32301-1556

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Covad Communications Company
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Florida Cable Telecommunications Assoc., Inc.
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Tallahassee, FL 32301

Florida Competitive Carriers Assoc.
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