

SWIDLER BERLIN SHEREFF FRIEDMAN, L.P. ORIGINAL

3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE (202) 424-7647

NEW YORK OFFICE
405 LEXINGTON AVENUE
NEW YORK, NY 10174

September 14, 2000

VIA FEDERAL EXPRESS

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

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RECORDS AND REPORTING

Re: Response to Staff's Second Set of Interrogatories and Second Request for Production of Documents of Broadslate Networks, Inc., Cleartel Communications, Inc., and Florida Digital Network, Inc. in Docket No. 990649-TP

Dear Ms. Bayo:

Enclosed please find one original and fifteen copies of The Coalition's Motion for Leave to Late File Discovery Responses to Staff. Also enclosed please find one original and fifteen copies of the Response to Staff's Second Set of Interrogatories and Second Request for Production of Documents in Docket No. 990649-TP of Broadslate Networks, Inc., Cleartel Communications, Inc. and Florida Digital Network, Inc. (the "Coalition"). Because the requests propounded on these three parties were identical, we have provided one consolidated response. 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 yours,

Michael C. Sloan
Counsel for the Coalition

- APP Enclosures
- CAF
- CMP
- COM cc. All Parties of Record
- CTR John Spilman
- ECR Hope G. Colantonio
- LEG Mike Gallagher
- OPC
- PAI 348473.1
- RGO
- SEC
- SER
- OTH

Response forwarded by e-mail

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DOCUMENT NUMBER-DATE
11595 SEP 15 8

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

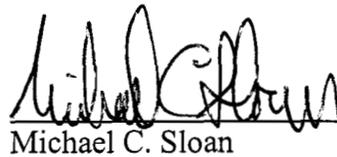
In re: Investigation into Pricing of) Docket No. 990649-TP
Unbundled Network Elements)
_____) Filed: September 14, 2000

MOTION FOR LEAVE TO LATE FILE
DISCOVERY RESPONSES TO STAFF

The Coalition, by its undersigned attorneys, petitions the Florida Public Service Commission ("Commission") for leave to file responses to Staff's discovery request in the above-captioned proceeding out of time. Staff served its Second Set of Interrogatories and Second Request for the Production of Documents on August 26, 2000, but due to an attorney transition Staff's requests were not discovered until recently.

The Coalition seeks leave to file its responses so that the Commission and the parties will have all pertinent information prior to the hearing.

Respectfully submitted the 14th day of September, 2000.



Michael C. Sloan
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, D.C. 20007-5116
Telephone: 202/424-8458
Facsimile: 202/424-7643

Counsel for The Coalition