

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate)
methods to compensate carriers for)
exchange of traffic subject to Section 251)
of the Telecommunications Act of 1996.)
_____)

Docket No. 000075-TP

Filed: February 26, 2001

**TCG OF SOUTH FLORIDA'S
AMENDED OBJECTION TO BELL SOUTH
TELECOMMUNICATIONS, INC.'S FIRST SET
OF INTERROGATORIES NO. 6**

TCG of South Florida ("TCG"), by and through its undersigned counsel, and pursuant to the Order Establishing Procedure (PSC-00-2229-PCO-TP), files this Amended Objection to BellSouth Telecommunications, Inc.'s ("BellSouth") Interrogatory Number 6 of its First Set of Interrogatories dated February 2, 2001, and states:

1. Interrogatory No. 6 in BellSouth's First Set of Interrogatories states as follows:

Has TCG requested that any state commission outside of BellSouth's region arbitrate, pursuant to Section 252 of the Telecommunications Act of 1996, any of the issues raised in the generic ISP proceeding? If the answer to this interrogatory is in the affirmative, please identify the specific issue on which arbitration was sought; identify the state commission before which TCG sought arbitration, including the case name, docket number, and date the petition was filed; and describe with particularity the state commission's resolution of the issue and identify the state commission Order in which such resolution was made.

2. On February 12, 2001, TCG filed a specific objection to BellSouth's Interrogatory No. 6. The basis for TCG's objection is that the information requested is overly broad and unduly burdensome, and the requested information is available to BellSouth in publicly filed documents. TCG further stated in the specific objection to BellSouth's Interrogatory No. 6 that TCG would identify any state commission outside of BellSouth's region wherein TCG requested the Commission to arbitrate the issues raised in this generic ISP proceeding.

DOCUMENT NUMBER-DATE

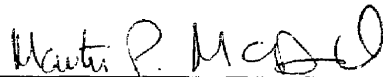
U 2630 FEB 26 2001

REGISTRATION REPORTING

3. TCG hereby amends the previously filed objection to BellSouth's Interrogatory No. 6 to correct its inadvertent reference to state commission arbitrations outside the BellSouth region. To require TCG to comply with BellSouth's Interrogatory No. 6 as it pertains to states outside BellSouth's region would be unduly burdensome to TCG and would require TCG to research public records that are equally available to BellSouth. TCG has served its Response to BellSouth's Interrogatory No. 6 on this date and identified therein all states within BellSouth's region wherein TCG has arbitrated any issue relating to Phase I of this docket, the specific issue on which arbitration was sought, and the state commission before which TCG sought arbitration, including the case name, docket number and date the petition was filed.

Respectfully submitted this 26th day of February, 2001.

Respectfully submitted,



Kenneth A. Hoffman, Esq.
Martin P. McDonnell, Esq.
Rutledge, Ecenia, Purnell & Hoffman, P.A.
P. O. Box 551
Tallahassee, FL 32302
(850) 681-6788 (Telephone)
(850) 681-6515 (Telecopier)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 26th day of February, 2001:

Felicia Banks, Esq.
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370
Tallahassee, Florida 32399-0850

Elizabeth Howland
Allegiance Telecom, Inc.
1950 Stemmons Freeway, Suite 3026
Dallas, TX 75207-3118

Morton Posner, Esq.
Regulatory Counsel
Allegiance Telecom, Inc.
1150 Connecticut Avenue, N.W.
Suite 205
Washington, DC 20036

Ms. Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

James C. Falvey, Esq.
e.spire Communications, Inc.
133 National Business Parkway
Suite 200
Annapolis Junction, MD 20701

Michael A. Gross, Esq.
Florida Cable Telecommunications, Asso.
246 East 6th Avenue
Tallahassee, FL 32303

Mr. Paul Rebey
Focal Communications Corporation of Florida
200 North LaSalle Street, Suite 1100
Chicago, IL 60601-1914

Global NAPS, Inc.
10 Merrymount Road
Quincy, MA 02169

Scott Sapperstein
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, Florida 33619-1309

Donna Canzano McNulty, Esq.
MCI WorldCom
325 John Knox Road, Suite 105
Tallahassee, FL 32303-4131

Laura L. Gallagher, Esq.
MediaOne Florida Telecommunications, Inc.
101 E. College Avenue, Suite 302
Tallahassee, FL 32301

Norman Horton, Jr., Esq.
Messer Law Firm
215 S. Monroe Street, Suite 701
Tallahassee, FL 32301-1876

Jon Moyle, Esq.
Cathy Sellers, Esq.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301

Herb Bornack
Orlando Telephone Company
4558 SW 35th Street, Suite 100
Orlando, FL 32811-6541

Peter Dunbar, Esq.
Karen Camechis, Esq.
P. O. Box 10095
Tallahassee, FL 32302-2095

Charles R. Rehwinkel, Esq.
Susan Masterton, Esq.
Sprint-Florida, Incorporated
Post Office Box 2214
MS: FLTLHO0107
Tallahassee, FL 32316

Mark Buechele
Supra Telecom
1311 Executive Center Drive, Suite 200
Tallahassee, Florida 32301

Kimberly Caswell, Esq.
Verizon Select Services, Inc.
P. O. Box 110, FLTC0007
Tampa, Florida 33601-0110

Charlie Pellegini, Esq.
Patrick K. Wiggins, Esq.
P. O. Drawer 1657
Tallahassee, Florida 32302

Robert Scheffel Wright, Esq.
John T. LaVia, III, Esq.
P. O. Box 271
Tallahassee, FL 32302

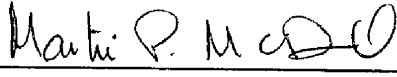
Wanda G. Montano, Esq.
US LEC Corporation
Morrocroft III
6801 Morrison Boulevard
Charlotte, NC 28211

Carolyn Marek
Time Warner Telecom of Florida, L.P.
233 Bramerton Court
Franklin, TN 37069

Joseph A. McGlothlin, Esq.
Vicki Gordon Kaufman, Esq.
117 South Gadsen Street
Tallahassee, FL 32301

Michael R. Romano, Esq.
Level 3 Communications, LLC
1025 Eldorado Boulevard
Broomfield, Colorado 80021

Marsha Rule, Esq.
AT&T
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549

By: 
MARTIN P. MCDONNELL, ESQ.

AT&T/tcg2.objections