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BellSouth Telecommunications, Inc.
150 South Monroe Street
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August 22, 2001

Mrs. Blanca S. Bayó
Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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COMMISSION
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Re: Docket No. 010740-TP (IDS Telcom)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth's Motion to Compel Discovery and for a Continuance, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

Patrick W. Turner (KA)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

APP _____
CAF _____
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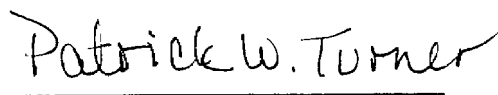
CERTIFICATE OF SERVICE
Docket No. 010740-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (*), Electronic mail and Federal Express this 22st day of August, 2001 to the following:

Mary Anne Helton (*)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Te. No. (850) 413-6096
mhelton@psc.state.fl.us

Suzanne Fannon Summerlin
1311-B Paul Russell Road
Suite 201
Tallahassee, Florida 32301
Tel. No. (850) 656-2288
Fax No. (850) 656-5589
summerlin@nettally.com
Represents IDS

Michael Noshay, President
IDS Long Distance, Inc.
n/k/a IDS Telcom, LLC
1525 N.W. 167th Street
Second Floor
Miami, Florida 33169
Tel. No. (305) 913-4000
Fax No. (305) 913-4039
mnoshay@idstelcom.com



Patrick W. Turner (KA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of IDS Long Distance, Inc.) n/k/a IDS Telecom, L.L.C., Against) BellSouth Telecommunications, Inc., and) Request for Emergency Relief) _____)	Docket No.: 010740-TP Filed: August 22, 2001
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**BELLSOUTH'S MOTION TO COMPEL
DISCOVERY AND FOR A CONTINUANCE**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.204 of the Florida Administrative Code, respectfully requests that Commission enter an Order (1) compelling IDS Telecom, L.L.C. ("IDS") to respond fully and completely to BellSouth's First Set of Interrogatories and First Request for Production of Documents, and (2) continuing both the deadline for BellSouth to file its rebuttal testimony and the hearing in this matter. The grounds for this motion are IDS' "extraordinary and substantial failure to respond to BellSouth's pending discovery requests." In further support of this motion, BellSouth shows the Commission that:

1. On May 11, 2001, IDS filed a Complaint against BellSouth alleging that BellSouth has breached its interconnection agreement with IDS and engaged in anticompetitive activities to the detriment of IDS and other ALECs. IDS requested, among other relief, that the Commission hold an expedited hearing in this matter. Complaint ¶ 84(a).

2. On July 18, 2001, the Commission issued its Order Establishing Procedure in this docket, Order No. PSC-01-1501-PCO-TP ("Procedural Order"). In its Procedural Order, the Commission ruled that "[d]ue to the expedited time schedule for this

proceeding, all discovery responses shall be served within 20 days of receipt of the discovery requests.” Order at p. 2. It also required that objections to or request for clarifications of discovery requests be made within 10 days of service of the discovery requests. *Id.* The Procedural Order set August 13, 2001, as the deadline for BellSouth to file its direct and rebuttal testimony, and it scheduled the evidentiary hearing for September 21 and October 1, 2001. *Id.* at 6-7.

3. On July 31, 2001, BellSouth served IDS with its First Set of Interrogatories and First Request for Production of Documents (“Discovery Requests”). According to the Procedural Order, any objections to the Discovery Requests were required to be made by August 10, 2001, and IDS’ responses were due to be served on or before August 20, 2001.

4. On August 6, 2001, BellSouth filed a Motion for an Extension of Time to August 27, 2001, to file its testimony, on the grounds that it needed time to analyze the discovery responses due from IDS on August 20, 2001, before filing its testimony, and because IDS’ direct testimony filed on July 23, 2001, is long and fact-intensive. IDS consented to the motion on the condition that BellSouth not seek a continuance of the hearing in this matter for any reasons other than the unavoidable unavailability of a witness or “IDS’ extraordinary and substantial failure to adequately respond to BellSouth’s pending discovery requests.”

5. On August 10, 2001, the Commission issued its Order No. PSC-01-1640-PCO-TP, granting BellSouth until August 27, 2001, to file rebuttal testimony so as to “enable BellSouth to consider IDS’ discovery responses when its files its rebuttal testimony.”

The Commission also extended the deadline for BellSouth to file its direct testimony to August 20, 2001.

6. IDS did not object to *any* of BellSouth's Discovery Requests, nor did it seek an extension of time to serve its responses.

7. After 5:30 p.m. on August 20, 2001, IDS slid under the door of BellSouth's Florida legal office IDS' Answers to BellSouth's First Set of Interrogatories and IDS' Responses to BellSouth's First Request for Production of Documents. (Copies of IDS' "Answers" and "Responses" are attached hereto as Exhibits "A" and "B.")¹ IDS' "responses" do not, for the most part, even purport to be responsive to the Discovery Requests. In response to each and every one of BellSouth's 20 requests for productions of documents, IDS stated unabashedly:

IDS has not had the resources to collect all the records, notes, correspondence that it may have in its possession. If and when IDS has this compiled it will supply them to BellSouth.

IDS' "Answers" to BellSouth First Set of Interrogatories are equally non-responsive. In response to 48 of the 103 interrogatories, IDS responded the same way it responded to all of BellSouth's document requests – It said it did not have the time to provide responsive information, but would supply answers "***if and when***" it ***decided*** to devote the resources to doing so.² For at least 23 additional interrogatories, IDS provided a

¹ Given that IDS did not serve its responses to BellSouth's "Discovery Requests" until after the close of business on August 20, the BellSouth attorneys responsible for this matter did not have the opportunity to review them until August 21, 2001. As explained later in this Motion, IDS' belated service of its discovery responses is not itself an issue, because IDS simply did not respond at all to a majority of the Discovery Requests, and it provided only partial responses to several others.

² See IDS' "Answers" to Interrog. Nos. 3-5, 9, 19, 26, 35, 39, 43, 55-56, 65-68, 70-93, and 95-103.

partial answer and stated that it had additional responsive information and would provide it to BellSouth "if and when" it had the time.³

In response to numerous other interrogatories, IDS purported to provide an answer, but its answer was in fact non-responsive or only partially responsive. For example, in Interrogatory No. 52, BellSouth asked IDS to itemize each component of the "serious damages" IDS witness Keith Kramer claims IDS has incurred as a result of BellSouth's alleged anticompetitive conduct, to provide the monetary amount of such damage, and to explain how IDS calculated the amount. There is no dispute that BellSouth is entitled to know this basic information. IDS' "answer" does not, however, state the amount of its alleged damages or how it calculated its supposed damages.

Another example is IDS' response to Interrogatory No. 61. IDS witness Angel Leiro claims in his prefiled direct testimony that "[m]any of IDS' customers have received communications from BellSouth telemarketers to the effect that 'IDS is going bankrupt,' or 'IDS is going out of business,' or 'IDS is an unreliable provider of telecommunications services.'" BellSouth, accordingly, asked IDS in Interrogatory No. 61 to identify the customers that have received such communications from BellSouth telemarketers. IDS responded that, in addition to the affidavits attached to IDS' complaint, "IDS will provide all other affidavits documents and names of customers in its possession whom an affidavit was not provided but who IDS has documentation concerning the misrepresentations." Per the Commission's Procedural Order, BellSouth was entitled to that information no later than August 20th.

³ See IDS' "Answers" to Interrog. Nos. 8, 10, 15-16, 18, 24-25, 27, 29, 32, 34, 36-37, 40, 48-50, 53, 57-59, 63, and 94.

8. **The Commission should order IDS to fully and completely answer all of BellSouth's interrogatories and provide BellSouth with all documents responsive to BellSouth's document requests.** IDS did not object to any of BellSouth's Discovery Requests. Consequently, there is no dispute that IDS is required to provide full and complete responses to the Discovery Requests. IDS admittedly did not do so by the August 20 deadline, nor did it seek an extension of time to serve its discovery responses. Instead, IDS, quite amazingly, told BellSouth and this Commission that it did not have the resources to provide responsive information to the majority of the Discovery Requests by the Commission-established deadline and that it would do so "if and when" IDS was ready. In addition, IDS provided partial or non-responses to many other Discovery Requests. The Commission should not permit IDS (or any party) to flout the Commission's discovery rules and Orders. It should order IDS to provide complete responses to all of BellSouth's Discovery Requests. The Commission also should consider sanctioning IDS for its extraordinary and substantial failure to respond to BellSouth's Discovery Requests and for its failure to comply with the Commission's Procedural Order.

9. **The Commission should continue the August 27 deadline for BellSouth to file rebuttal testimony and should continue the hearing of this matter so that BellSouth has the opportunity to use information provided in response to its Discovery Requests in its rebuttal testimony and at the hearing.** IDS' 34-page Complaint contains numerous specific allegations of wrongdoing by BellSouth and requests several forms of relief. In addition, the direct testimony IDS filed is very fact-intensive and contains several additional allegations of improper conduct by BellSouth

and its agents. Virtually all of BellSouth's Discovery Requests ask IDS to provide the basis for its numerous, fact specific allegations. BellSouth needs this basic information in order to prepare rebuttal testimony and to adequately prepare to cross-examine IDS' witnesses at the hearing. The Commission recognized as much in its August 10 Order, when it extended the time for BellSouth to file rebuttal testimony so as to "enable BellSouth to consider IDS' discovery responses when it files its rebuttal testimony." Due to IDS' failure to meet the August 20 deadline for responding to BellSouth's Discovery Requests, BellSouth will not have the opportunity to consider IDS' discovery responses before filing its rebuttal testimony if the August 27 deadline for BellSouth to file its testimony is not continued.

It would be extremely unfair and prejudicial to BellSouth to allow IDS' failure to respond to discovery to deprive BellSouth of the opportunity to review and analyze IDS' discovery responses before it files rebuttal testimony or cross-examines IDS' witnesses. This is especially true given the fact that at the same time IDS said it doesn't have the resources to respond to BellSouth's Discovery Requests in accordance with the Commission's Procedural Order, it has been engaging in broad discovery of BellSouth. Since the time BellSouth served its Discovery Requests on IDS, IDS has deposed 14 BellSouth employees, and IDS' counsel indicated recently that IDS intends to depose several preparing responses more. In addition, on August 14, 2001, during the timeframe IDS should have been preparing responses to BellSouth's Discovery Requests but decided it did not have the resources to do so, IDS served a comprehensive set of discovery requests on BellSouth. IDS should not be permitted to utilize discovery mechanisms to gain information from BellSouth while at the same time

defying the Commission's Procedural Order by refusing to provide discovery responses to BellSouth. Indeed, given IDS' inability, or at least its refusal, to provide responses to requests asking for information that substantiates the fundamental allegations of its Complaint, it appears that perhaps IDS cannot do so and is engaged on a fishing expedition in the hopes that BellSouth can prove IDS' case for it. In any event, IDS' failure to provide information in response to BellSouth's discovery requests is severely prejudicing BellSouth's ability to prepare its case.

IDS asked that this matter proceed on an expedited basis. IDS now concedes, however, that it does not have the resources to proceed on an expedited basis without severely prejudicing BellSouth's ability to defend itself against the as-yet unsubstantiated allegations against it. Consequently, the Commission should suspend all pending deadlines indefinitely, including continuing the hearing of this matter, until IDS provides full responses to the Discovery Requests. Once IDS fulfills its obligation to provide complete responses to BellSouth Discovery Requests, the Commission should issue an Amended Procedural Order establishing new deadlines that provide BellSouth with a fair opportunity to respond to the allegations against it through rebuttal testimony and cross-examination of IDS' witnesses.

IDS acknowledged earlier that an "extraordinary and substantial failure to respond to BellSouth's pending discovery requests" would be grounds for continuing the hearing. There is no doubt that IDS has in fact extraordinarily and substantially failed to respond to the Discovery Requests. Consequently, the Commission should continue this matter indefinitely.

10. Pursuant to Rule 28-106.204(3) of the Florida Administrative Code counsel for BellSouth conferred with counsel for IDS with respect to this motion. IDS' counsel stated that IDS objects to this motion.

Respectfully submitted this 22nd day of August, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (LA)

JAMES MEZA III

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

R. Douglas Lackey

R. DOUGLAS LACKEY (LA)

PATRICK TURNER

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0747

407290

Exhibit A

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of IDS Long Distance, Inc.
n/k/a IDS Telecom, L.L.C., Against
BellSouth Telecommunications, Inc., and
Request for Emergency Relief.

Docket No. 010740-TP
Filed August 20, 2001

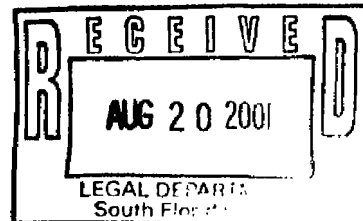
**IDS TELCOM L.L.C.'S NOTICE OF RESPONSE TO
BELL SOUTH'S FIRST REQUEST TO PRODUCE (1-20)**

IDS Telecom, L.L.C. (hereinafter "IDS"), by and through its undersigned
attorney, hereby files its Notice of Response to BellSouth's First Request to Produce
(Nos. 1-20) on this 20th day of August, 2001.

Respectfully submitted,

Suzanne F. Summerlin (signed in absence to avoid delay)

Suzanne Fannon Summerlin
Florida Bar No. 398586
1311 B Paul Russell Road, Suite 201
Tallahassee, Florida 32301
(850) 656-2288
(850) 656-5589
Attorney for IDS Telecom



By Hand Delivery
After 5:30 p.m.


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing
was furnished by fax (*) and U.S. Mail this 20th day of August, 2001, to:

Mary Anne Helton, Esq.
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Nancy B. White, Esq. (*)
James Meza III
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

Charles Beck, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, #812
Tallahassee, FL 32399-1400


Suzanne Fannon Summerlin
(signed in absence to avoid delay)

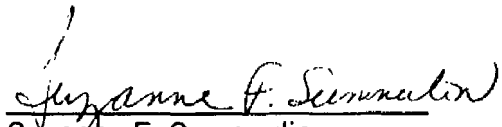
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re Complaint of IDS Long Distance, Inc.)
n/k/a IDS Telcom, L.L.C., Against)
BellSouth Telecommunications, Inc., and) Docket No. 010740-TP
Request for Emergency Relief.) Filed August 6, 2001
_____)

IDS TELCOM LLC'S RESPONSES TO BELLSOUTH'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS.

IDS Telcom, LLC , ("IDS") pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.340 and 1.350, Florida Rules of Civil Procedure, hereby files the following Responses to BellSouth Telecommunications, Inc 's ("BellSouth") First Request for Production of Documents dated August 1, 2001.

I HEREBY CERTIFY that a true and correct copy of the foregoing Response to BellSouth First Request for Production of Documents to IDS was furnished by Hand Delivery (*) this, 20th day of August 2001, to Nancy White, Esquire, General Counsel, BellSouth Telecommunications, Inc., 150 West Flagler Street, Miami, Florida Street, 33130.

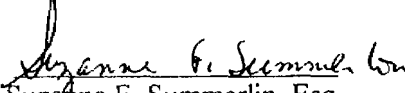

Suzanne F. Summerlin
Signed in the absence of to avoid
delay.

CERTIFICATE OF SERVICE
Docket No. 010740-TP

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was served via Hand Delivery (*) and Federal Express this 20th day of August, 2001 to the following

Mary Ann Helton
Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Nancy B. White (*) Miami Office
James Meza III
c/o Nancy H. Sims
Patrick W Turner
Attorneys for BellSouth Telecommunications
150 So Monroe Street, Suite 400
Tallahassee, Florida 32301
(305) 347-5561
(305) 577-4491


Suzanne F Summerlin, Esq.

RESPONSES TO BELL SOUTH'S FIRST REQUEST FOR PRODUCTION

1. Please produce all documents that are identified in, that support, or that are otherwise related to your response to each of BellSouth's interrogatories.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

2. Please produce any documents IDS has received from to BellSouth that identify or describe the Unbundled Network Element Platform ("UNE-P") or that provide guidance or instruction as to show how to order UNE-P, use UNE-P, or convert existing resale lines to UNE-P lines.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

3. Please produce any documents IDS has received from BellSouth that identify or describe the Electronic Data Interface ("EDI") or that provide guidance or instruction as to how to obtain, install and/or use EDI.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

4. Please produce any documents that identify, describe, set forth the results of, or are otherwise related to the BETA-testing of the Bulk Ordering of Port/Loop Combo Services via LENS, referenced on Page 18, lines 8-12 of Mr. Kramer's prefiled Direct Testimony.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

5. Please produce any documents that identify, describe, set forth the results of, or are related to the tests referenced on page 19, lines 8-10 or Mr. Kramer's prefiled direct testimony.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

6. With regard to the meeting described on page 22, line 1 through page 23, line 14, please produce any: documents IDS received from BellSouth during that meeting, documents IDS produced to BellSouth during that meeting, notes that were taken during the meeting; minutes of that meeting; or other documents that describe any discussions that took place during the meeting.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

7. With regard to page 26, lines 3-6 of Mr. Kramer's prefiled direct testimony, please produce all documents that show "how many orders, with the corresponding lines (IDS) input into LENS on a daily basis for the Bell processing center to provision" and "how many lines BellSouth's LCSC could process and convert on a day-by-day basis".

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

8. With regard to the spreadsheet referenced on page 33, lines 5-12 of Mr. Kramer's prefiled direct testimony, please produce: a copy of the spreadsheet; a copy of each and every work paper or other document upon which IDS relied in creating the spreadsheet; and a copy of any updated version of the spreadsheet, in any updated versions exist.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

9. Please produce copies of the Billing Adjustment Request Forms referenced on page 44, lines 9-10 of Mr. Kramer's prefiled direct testimony.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

10. Please produce any documents that describe, explain, support, or are related to IDS' decision to double the number of its customer service representatives as set forth on page 45, lines 1-4 of Mr. Kramer's prefiled direct testimony.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

11. Please produce a copy of the letters referenced on page 52, lines 12-14 of Mr. Kramer's prefiled direct testimony.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

12. Please produce a copy of the audit referenced on page 54, line 10 of Mr. Kramer's prefiled direct testimony and please produce copies of all work papers and other documents IDS relied on in conducting the audit or that are otherwise related to the audit.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

13. Please produce a copy of the letter from Petra Pryor that is referenced on page 54, lines 19-22 of Mr. Kramer's prefiled direct testimony.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

14. For each "win back program" IDS identifies in response to Interrogatory 45, please produce all documents that support or that are related to IDS' contention that such programs are priced below cost.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

15. Please produce copies of BellSouth's Methods and Procedures IDS that were allegedly written by Ms. Wellman, as referenced on page 4, lines 5-9 of Ms. Wellman's prefiled direct testimony.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

16. With regard to the polling referenced on page 6, lines 9-18 of Mr. Hamilton's prefiled direct testimony, please produce copies of: any documents that set forth, summarize, or describe the methods IDS used to conduct such polling, the manner in which IDS decided which customers to poll, and/or the results of the polling.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

17. With regard to the polling referenced on page 6, lines 9-18 of Mr. Hamilton's prefiled direct testimony, please produce copies of: any documents sent by IDS to polled customers; any scripts used by IDS during the polling; any documents sent from polled customers to IDS, and any documents that purport to describe or summarize any information provided to IDS by any polled customer.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

18. Please produce all recordings created or received by IDS as a result of the polling referenced on page 6, lines 9-18 of Mr. Hamilton's prefiled direct testimony.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

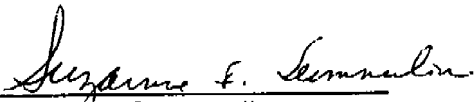
19. If IDS is in possession of affidavits that purport to describe actions taken by BellSouth or any purported employee, agent, or independent contractor of BellSouth with regard to any current or former customer of IDS or any other ALEC, please produce copies of each such affidavit.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

20. Please produce any recordings or documents created or received by IDS as a result of the "hundreds of call" IDS' Marketing Department's Customer Relations group described on page 61, lines 10-16 of Mr. Kramer's prefiled direct testimony.

IDS has not had the resources to collect all of the records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

Respectfully submitted,


Suzanne F. Summerlin
Suzanne F. Summerlin
Florida Bar No. 398586
1311-B Paul Russell Road
Suite 201
Tallahassee, Florida 32301
(850) 656-2288
Attorney for IDS Long Distance, Inc.
n/k/a IDS Telcom, LLC

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of IDS Long Distance, Inc.
n/k/a IDS Telecom, L.L.C., Against
BellSouth Telecommunications, Inc., and
Request for Emergency Relief.

Docket No. 010740-TP
Filed August 20, 2001

**IDS TELCOM LLC'S NOTICE OF FILING ITS ANSWERS TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES (Nos 1-103)**

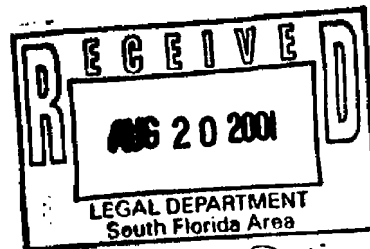
IDS Telecom, L.L.C. (hereinafter "IDS"), by and through its undersigned
attorney, hereby files its Notice of Filing its Answers to BellSouth's First Set of
Interrogatories (Nos. 1-103) on this 20th day of August, 2001.

Respectfully submitted,

Suzanne F. Summerlin

(signed in absence to avoid delay)

Suzanne Fannon Summerlin
Florida Bar No. 398586
1311 B Paul Russell Road, Suite 201
Tallahassee, Florida 32301
(850) 656-2288
(850) 656-5589
Attorney for IDS Telecom



By Hand Delivery
After 5:30

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing
was furnished by fax (*) and U.S. Mail this 20th day of August, 2001, to:

Mary Anne Helton, Esq.
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Nancy B. White, Esq. (*)
James Meza III
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

Charles Beck, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, #812
Tallahassee, FL 32399-1400



Suzanne Fannon Summerlin
(signed in absence to avoid delay)

THE FLORIDA PUBLIC SERVICE COMMISSION

In re Complaint of IDS Long Distance, Inc)
n/k/a IDS Telecom, L.L.C , Against)
BellSouth Telecommunications, Inc., and) Docket No. 010740-TP
Request for Emergency Relief.) Filed August 6,2001
_____)

**IDS TELCOM LLC'S ANSWERS TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES**

- 1. REQUEST. Please identify the USOC code IDS was provided, as referenced on page 14, lines 17-19 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS does not have information regarding the exact USOCs it was provided by Patti Knight, but IDS believes it was the conversion USOCs (USACC) or the vertical services USOC (UEPBF).

IDS contacted Bill Gulas at BellSouth and he provided the UEPBL, for business lines, the UEPBC for business with Caller ID, and UEPLX for loops.

These new USOC permitted the orders to go through within approximately 90 minutes.

- 2. REQUEST. Please describe in detail the "work-around" referenced on page 19, lines 8-10 of Mr. Kramer's prefiled direct testimony and identify the ISOC BellSouth allegedly had not entered into its billing system.

RESPONSE: No USOCs had been given to the rate file database fro the contract database, because the contract database had not communicated to the rate file database regarding the

3 REQUEST Please identify the test customers referenced on page 19, lines 8-10 of Mr. Kramer's prefiled direct testimony, including without limitation the name, billing address, and telephone numbers of the customers and the Purchase Order Numbers (PONs) associated with these test customers.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

4 REQUEST. Please Identify the 1,400 business customers referenced on page 19, lines 12-15 of Mr. Kramer's prefiled direct testimony, and provide the telephone number of each of the 5,500 local lines represented by these customers.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

5 REQUEST For each customer and/or line identified in Interrogatory No. 4

(a) Please state whether IDS continues to serve that customer and/or line;

(b) If IDS continues to service a particular customer and/or line, for each month from six months prior to the incident described on page 19, lines 12-15 of Mr. Kramer's prefiled direct testimony to the present, please state the services IDS provided to that customer and/or line and the revenue IDS received from such customer and/or line in each month.

(c) If IDS does not continue to serve a particular customer and/or line, please state the date upon which the customer disconnected such service and/or line with IDS; the reason the customer gave IDS for such disconnection; the services IDS provided to that customer and/or line in each of the six months prior to the incident described on page 19, lines 12-15 of Mr. Kramer's prefiled direct testimony; and the revenue IDS received from such customer and/or line in each of those six months.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

6 REQUEST: Please set forth all facts supporting the assertion on page 20, lines 4-5 that “most of these customers started calling BellSouth for help” and identify each and every customer IDS contends “started calling BellSouth for help.”

RESPONSE: Customer’s that were on Resale and were converted to UNE-P were not the main concern now as much as the new customers being converted from BST retail to IDS’ UNE-P. In particular, the UNE-P conversion customers, when experiencing the conversion related disruptions, contacted BellSouth to find out what the problem was because they did not know when they were being converted and expected it to be a seamless transition.

7. REQUEST: Please set forth all facts supporting the assertion on page 20, lines 7-10, of Mr. Kramer’s prefiled direct testimony that “BellSouth blamed IDS for the service outages” and that “customers were told that if they returned to BellSouth, their service would be restored within an hour.”

RESPONSE: Pursuant to the Interconnection Agreement between the parties and all of its amendments, IDS should theoretically be able to submit orders to convert, primarily BellSouth retail business lines with complex services, to IDS’ UNE-Platform pursuant to the FCC 319 Remand with virtually no disruption to the end-user. A seamless transition from BellSouth retail to ALEC (IDS) UNE-P.

IDS accomplishes these conversions utilizing BellSouth’s electronic interfaces currently (LENS)/(Mantiss). (Previously EDI etc) combined with BellSouth’s own technicians.

As a matter of course, a high percentage of the day-to-day orders submitted to BellSouth by IDS are new multi-line business customers followed by other service related customer orders.

When a customer is converted (by BellSouth) from BellSouth retail to IDS UNE-P and experiences service disruptions ranging from resetting voicemail (and losing all stored messages) to a total loss of dial tone possibly coupled with a recording that your (business) telephone “has been disconnected” after just having signed up with IDS or any ALEC for that matter, a customer will likely contact BellSouth repair or business office.

Example. An end-user loses dial tone during conversion. This happens when BellSouth fails to combine the proper Disconnection order with corresponding New Connection order during the conversion process. The

fact that the customer is experiencing a problem necessarily means that the order has not completed and LENS maintains the order in a pending status known as "Pending Service Order" or PSO. When the end-user contacts BellSouth's repair or business office to inquire about the problem the BellSouth Customer Service Representative ("CSR") looks up the customer account and is told that the account is in a PSO status converting to an ALEC (IDS).

This disruption should never occur and IDS has nothing technically to do with this disruption.

It is important to note that when the conversion takes place, nothing really happens. There are no changes made to the network, lines are not moved, and every piece of equipment looks and functions the same from one day to the next. The only change that takes place is an internal accounting entry on BellSouth's books.

Although BellSouth causes the disconnection for no apparent technical reason, due to that PSO status, BellSouth refuses to assist the customer (even though the customer is still technically BellSouth's and BellSouth will ultimately have to solve the problem), IDS cannot assist the customer either until the order to convert completes because BellSouth will not allow a repair ticket to be entered due to the PSO status.

The customer is now in "limbo" without dial tone and losing business. Because BellSouth does not tell the customer they caused the disruption and implies that IDS did, the customer believes IDS misled them and request that IDS' order be cancelled and services maintained with BellSouth. BellSouth will inform the customer that by canceling the conversion order they could have services restored right away while not refusing to honor IDS request for the same service order.

8 REQUEST: With regard to the assertions on page 20, lines 7-10, of Mr. Kramer's prefiled direct testimony, please identify each and every customer IDS contends was told by BellSouth that IDS was the cause of the service outages, and identify each and every customer IDS contends was told that if they returned to BellSouth, their service would be restored within an hour.

RESPONSE. All customers converted to IDS UNE-P from BellSouth retail during the period May 2000 through the filing of this complaint and experienced conversion related disruptions. This practice continues to this day.

BellSouth is required to maintain all conversion records for a reasonable time pursuant to the Commission's rules governing record retention.

IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

9. REQUEST: With regard to the assertions set forth on page 21, line 23 through page 22, line 1, please identify each of the customers and lines that IDS purportedly lost to BellSouth

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth

- 10 REQUEST: For each customer and/or line identified in response to Interrogatory No. 9, please state the date upon which the customer disconnected service with IDS, state the reason the customer gave IDS for such disconnection; state the services IDS provided to that customer and/or line for the six months prior to having been lost to BellSouth, and state the monthly revenue IDS received from that customer for each of those six months

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

IDS cannot provide each customer's specific reasons for leaving other than to say that their experience with IDS was negative from the beginning and it was caused by BellSouth's negligent handling of its conversion orders.

- 11 REQUEST: Please identify the BellSouth official referenced on page 23, lines 16-19 of Mr. Kramer's prefiled direct testimony.

RESPONSE: Keith Kramer was provided this information with the promise that he would maintain the individuals anonymity and therefore IDS is not in a possession to divulge this information.

12. REQUEST: With regard to page 25, lines 3-6 of Mr. Kramer's prefiled direct testimony, please explain in detail how IDS went about finding out how many orders, with the corresponding lines, IDS had input into LENS on a daily basis for the Bell processing center to provision and how IDS went about determining how many lines BellSouth's LCSC could process and convert on a day-to-day basis.

RESPONSE: Page 25, lines 3-6 of Mr. Kramer's prefiled direct testimony does not refer to the issues outlined in this request.

13 REQUEST: With regard to page 28, line 22, page 29, line 2 of Mr. Kramer's prefiled direct testimony, please identify each and every IDS customer that allegedly was told by a BellSouth representative that the customer could have service restored within the hour if the customer cancelled the conversion order and stayed with BellSouth.

RESPONSE: All customers converted to IDS UNE-P from BellSouth retail during the relevant period and who experienced conversion related disruptions

BellSouth has in its possession records related to these customers and is required to maintain all conversion records for a reasonable time pursuant to the Commission's rules governing record retention.

14 REQUEST: With regard to page 28, lines 23 to page 29, line 2 of Mr. Kramer's prefiled direct testimony, please identify each and every customer IDS contends was "hard sold" the Full Circle Program and/or the Advantage Plus program.

RESPONSE: Any and all customers that BellSouth converted to its Full Circle Program or its Advantage Plus Program IDS contends were "hard sold". The reason for being hard sold is that when a customer is left with no service on its business telephone lines and no reasonable prospect of having the problem solved immediately, they are told that a solution is to convert back to BellSouth which would entail canceling the pending service order from IDS.

The customer is then sold the Full Circle Program (currently the Advantage Plus) thereby locking the customer into a term agreement that it would not otherwise have with IDS. This is a hard sell.

15 REQUEST: Without limiting the scope of any other request, and given that the purported statement on page 29, lines 1-2 of Mr. Kramer's prefiled direct testimony is set forth in quotation marks, please state whether this portion of Mr. Kramer's testimony is based, in whole or in part, on any recordings, notes, or other documents purporting to set forth or summarize any such statement made by any BellSouth representative. If it is, please identify and describe each such recording, set of notes, or other document

RESPONSE: The statement in quotations on page 29, lines 1-2 of Mr. Kramer's prefiled direct testimony is made from first hand accounts with customers during the relevant time periods while end-users experienced conversion related disruptions. These statements were made directly to various if not all of IDS' Customer Service Representatives by disgruntled IDS customer on a daily basis.

The BellSouth Retail Business office will give the customer one timeframe to have services restored while the LCSC is giving the IDS' provisioning department a completely different and later timeframe to have services restored.

IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

16. REQUEST: With regard to page 38, lines 8-10 of Mr. Kramer's prefiled direct testimony, please identify each and every customer that BellSouth purportedly gave the impression that BellSouth had nothing to do with the disruption, and state with specificity the facts BellSouth purportedly misrepresented to each such customer.

RESPONSE: Page 38, lines 8-10 do not contend what is being asked in Interrogatory No. 16.

However, IDS cannot identify each and every customer which BellSouth gave the impression that BellSouth had nothing to do with the disruption. These conversations occurred daily and are derived made from first hand accounts with customers during the relevant time periods while end-users experienced conversion related disruptions. These statements were made directly to various if not all of IDS' Customer Service Representatives by disgruntled IDS customer on a daily basis.

The BellSouth Retail Business office will give the customer one timeframe (usually one hour) have services restored while the LCSC is giving the IDS' provisioning department a completely different and later timeframe to have services restored.

IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

17. REQUEST: Please identify the "two other carriers" referenced on page 33, line 22 through 34, line 1 of Mr. Kramer's prefiled direct testimony

RESPONSE: Access One and Access Integrated

18. REQUEST: Please identify each and every customer who purportedly had the type of experience with a BellSouth technician that is set forth on page 35, lines 8-23 of Mr. Kramer's prefiled direct testimony and provide the date of the experience, the services the technician said he or she was there to disconnect, and the telephone number associated with each such service.

RESPONSE: Any and all customers who had a truck roll or technician dispatch during an "as is" conversion (at least 95% of the orders submitted for new conversion by IDS are "as is" and require no truck roll or technician dispatch to the customer premise) would be part of this response.

BellSouth has in its possession records related to these customers and is required to maintain all conversion records for a reasonable time pursuant to the Commission's rules governing record retention. These records will depict the date of experience, services to be disconnected and the telephone number associated with such service.

IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

19. REQUEST: Please identify the customer and the telephone number(s) involved in each of the twenty-five accounts referenced on page 37, lines 12-13 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

20. REQUEST: Please explain in detail how IDS calculated the \$1,000,000 annual revenue figure set forth on page 39, lines 11-13 of Mr. Kramer's prefiled direct testimony.

RESPONSE: The figure alluded to in Mr. Kramer's testimony is actually higher and may be calculated by multiplying 400 accounts with lines averaging, at the time, \$213.00 a month for long distance and \$248.00 a

month for local service or a total of approximately \$461.00 per month.
This calculation yields \$2,212,800.00.

21 REQUEST: Please explain in detail how IDS calculated the 30% error rate set forth on page 41, lines 6-7

RESPONSE: The 30% figure discussed in Mr. Kramer's prefiled direct testimony is an approximation. Using the number of orders submitted to BellSouth that appear in IDS' tracker system, December 2000 and January 2001 and the number of orders in IDS tracker system as the basis of the calculation, a percentage can be derived of the error rate.

Example: Of the 4202 orders in the tracker for January, 2001, 824 of those orders completed several days past the due date scheduled and provided by BellSouth.

December 2000 - 3151 orders in the tracker, 711 of those orders completed several days past the due date scheduled and provided by BellSouth

November 2000 - 123 orders in the tracker, 52 of those orders completed several days past the due date scheduled and provided by BellSouth.

If you take the average of these three figures, you get an error rate of approximately 28.08%.

22. REQUEST Please identify the actual product name of the service that is referenced as "voicemail" on page 42, lines 20-22 of Mr. Kramer's prefiled direct testimony

RESPONSE: Memory Call.

23 REQUEST: Please explain in detail how IDS calculated the 50% problem rate set forth on page 43, line 18 of Mr. Kramer's prefiled direct testimony.

RESPONSE. The 50% problem rate referred to in Mr. Kramer's prefiled testimony at page 45, lines 18-22 is a culmination of service oriented end-user disruptions as well as orders not being processed and thus backlogged in BellSouth's electronic processing systems.

For every 2 orders that were submitted, 1 would have a problem either during the conversion or not being able to get past the provisioning process at all

24 REQUEST: Please identify each and every customer who purportedly "simply contacted BellSouth" as suggested on page 45, lines 18-22 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth

Additionally, any customers who experienced conversion related disruptions and could not get through to IDS' customer service center contacted BellSouth's Retail office for assistance.

25 REQUEST. Please explain in detail how IDS determined that at least 200 accounts it put in for conversion in December 2000 had gone back to BellSouth during the conversion process, as alleged on page 49, lines 13-16 of Mr. Kramer's prefiled direct testimony.

RESPONSE. The figure is a combined number of accounts from various States. (Florida, Alabama, Georgia and Kentucky) After further review of IDS' records, it has been determined that well over 200 accounts had gone back to BellSouth during or just after the conversion process to IDS in December 2000. All of these accounts switched back to BellSouth within 5 days of activation by BellSouth to IDS.

IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

26 REQUEST Please identify the customer and the telephone numbers associated with each of the 200 accounts referenced on page 49, lines 13-16 of Mr. Kramer's prefiled direct testimony.

RESPONSE IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

27. REQUEST: Without limiting the scope of any other request, and given that much of the discussion related on page 50, lines 6-11 of Mr. Kramer's prefiled direct testimony is set forth in quotation marks, please state whether this portion of Mr. Kramer's testimony is based, in whole or in part, on any recordings, notes, or other

documents purporting to set forth or summarize that discussion? If it is, please identify and describe each such recording, set of notes, or other document.

RESPONSE: No. The discussion on page 50, lines 6-11 of Mr. Kramer' prefiled direct testimony is not based in whole or in part, on any recordings, notes, or other documents which purport to set forth or summarize that discussion. The facts surrounding this testimony is evident by the Local Service Records obtained through LENS during and after the timeframe in question.

IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

IDS will produce any documentation which supports the issues discussed therein however it is important to note that the BellSouth representative mentioned in the testimony refused to put these instructions in writing at the time.

28. REQUEST Please explain in detail how IDS "found out" the information set forth on page 52, lines 12-14 of Mr. Kramer's prefiled direct testimony.

RESPONSE: Attached is a copy of a letter sent to an IDS customer by BellSouth shortly after converting services to IDS.

This letter is clearly intended to mislead the customer into believing that the telephone services are somehow different from what had been provided by BellSouth and the document speaks for itself.

Furthermore, although these letters are not dated by BellSouth, this specific letter was received by the customer on August 17, 2000. As is depicted by the firm order "Acknowledgment", the order to convert was submitted on August 3, 2000 at 10:13 AM. On August 22, 2000 (5 days after receiving the letter) the attached LENS Customer Service Record was not yet updated and remained on a PSO or Pending Service Order status which effectively does not allow IDS to submit any kind of repair or trouble ticket whatsoever to the customer until said conversion is completed.

29. REQUEST: Please identify each customer who purportedly received a win-back letter while LENS showed that the customer's conversion was still pending as alleged on page 52, lines 22-23 of Mr. Kramer's prefiled direct testimony.

RESPONSE: Notwithstanding the fact that every customer who converts its services to another local exchange carrier receives this type of "win-back" letter. It is IDS' contention that any and all customers who converted their services to IDS during the relevant time period (November/December 2000) received this kind of letter while the conversion was still in a pending status.

IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

30. REQUEST: Please explain in detail how IDS calculated the 1,100 customer figure set forth on page 53, line 2 of Mr. Kramer's prefiled direct testimony.

RESPONSE: This calculation is easily arrived at through BellSouth's own loss reports provided to IDS. One can compare the customers whose orders were submitted to BellSouth, and later cancelled, that IDS received a bill for from BellSouth. This clearly indicates that the customer never converted to IDS.

31. REQUEST: Please explain in detail how IDS calculated the 297 customer figure and the 100 lines figure set forth on page 53, lines 2-4 of Mr. Kramer's prefiled direct testimony.

RESPONSE: See response to Interrogatory No. 30.

32. REQUEST: Please explain in detail how IDS conducted the audit referenced on page 54, line 10 of Mr. Kramer's prefiled direct testimony.

RESPONSE: The audit referenced in Mr. Kramer's prefiled direct testimony at page 54 line 10 was not a formal audit but rather a random audit conducted "on the fly" in order to gauge and verify that the affected orders were in fact backdated. Because Mr. Claude Morton's letter of January 8, 2001 served as verification that BellSouth intended to charge IDS for the time that the customer was with BellSouth when the customer should have already been converted to IDS in order to show that they were converting the orders timely (thus the backdating) IDS concluded

what had been told to it by BellSouth concerning the backdating was in fact true.

IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

- 33 REQUEST: Please explain in detail how IDS went about determining that BellSouth purportedly had backdated conversions as alleged on page 54, lines 10-12 of Mr. Kramer's prefiled direct testimony

RESPONSE: When IDS reviewed the customer notification date on the CSR, IDS realized that the completion date was reflecting the original due date on the CSR, the completion date would reflect the original due date however the completion notice was dated anywhere between 2-3 weeks after the due date.

- 34 REQUEST: Without limiting the scope of any other request, and given that lines 21-23 of page 56 of Mr. Kramer's prefiled direct testimony are set forth in quotation marks, please state whether this portion of Mr. Kramer's testimony is based, in whole or in part, on any recordings, notes, or other documents purporting to set forth or summarize any such statements made by any BellSouth representative. If it is, please identify and describe each such recording, set of notes, or other document.

RESPONSE: The testimony provide in Mr. Kramer's prefiled direct testimony on page 56, lines 21-23 is not primarily based on any recording, notes or other documents purported to set forth or summarize any such statements This testimony is based on first hand day to day accounts of customer's calling into IDS' customer service center.

IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

35. REQUEST: Aside from the customers identified in the affidavits attached to Mr. Leiro's prefiled direct testimony, please identify all IDS customers who purportedly were told by "BellSouth" that IDS was going out of business or was bankrupt as alleged on page 58, line 22 through page 59, line 1 of Mr. Kramer's prefiled direct testimony

IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

- 36 REQUEST Please explain in detail all facts supporting the statement, set forth on page 59, lines 16-17 of Mr. Kramer's prefiled direct testimony, that "BellSouth telemarketed every single one of my customers."

IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

BellSouth filed notice of its Full Circle Program win-back tariff on August 25, 2000. This win-back tariff became effective on October 9, 2000, and was to expire April 6, 2001. At the time IDS' had already been offering a flat 20% discount off of BellSouth's line charges and feature rates through its Total Solution package via direct sales, agent sales and telemarketing.

On November 13, 2000 Brad Hamilton, IDS' Product Manager sent IDS' Account Manager with BellSouth, Mr. Michael Lepkowski an e-mail requesting participation in the aforementioned program as instructed on the tariff notice. Mr. Lepkowski forwarded Mr. Hamilton's request to Cathy Crosswhite, Support Manager at BellSouth. Ms. Crosswhite sent Mr. Hamilton a response via e-mail dated November 14, 2000, and indicated that the Full Circle Program tariff had been withdrawn as of November 9, 2000.

On November 30, 2000, BellSouth gave notice of another win-back tariff, called the Full Circle 2001. This second win-back tariff is essentially the same as the previous Full Circle Program win-back tariff and became effective January 15, 2001 and was to expire on July 13, 2001. Mr. Hamilton sent two additional e-mails to Michael Lepkowski dated January 5, 2001 and January 12, 2001 requesting information to participate in this new Full Circle 2001 program as indicated on the notice to IDS.

At no time has BellSouth provided a way for IDS to participate in these Full Circle Tariffs

The criteria required to participate in the tariff savings speak for themselves and are clearly designed and targeted to "win-back" the very customers who have switched their telephone services to "another local exchange carrier"

Both win-back tariffs offer up to 20% discount and target former BellSouth business customers who changed to another local service provider in the previous two years and who had a monthly BellSouth revenue of \$70 to \$12,500. In addition, BellSouth waived all line connection charges on the initial service order establishing that service although the customer may have only "left" BellSouth for a few days.

In May/June 2001, amidst the growing scrutiny by IDS and presumably other CLECs BellSouth informed IDS that it had withdrawn this Full Circle 2001 tariff.

- 37 REQUEST: Please identify each of the "over 300 customers" referenced on page 60, line 14 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

However, IDS can say that any and all new customers who contacted BellSouth and believed that they had cancelled their order to convert to IDS or who requested a "switch back" to BellSouth from IDS after the conversion completed, and nevertheless received an invoice from IDS was under this impression.

- 38 REQUEST: Please explain in detail how IDS knows that the "over 300 customers" are "under this false impression" as alleged on page 60, line 14 of Mr. Kramer's prefiled direct testimony.

RESPONSE: The testimony provided in Mr. Kramer's prefiled direct testimony on page 60, line 14 is primarily based on real time calls from disgruntled customers who were experiencing multiple conversion related disruptions of their business telephone services during business hours.

Most of the customers who filed complaints for slamming did so because they correctly thought and expected that their service would remain on the same underlying network they had with BellSouth. They also expected a seamless transition with no end-user disruption. This is a very key point in the decision for a business customer to switch its telephone service. Upon experiencing a conversion related service disruption and depending on the severity of the disruption, the average customer will believe they were somehow misled by IDS thus leading to slamming or misrepresentation complaints.

39. REQUEST Please identify each customer who was called through IDS' Marketing Department's Customer Relations group as set forth on page 61, lines 10-16 of Mr. Kramer's prefiled direct testimony

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

40. REQUEST Please explain in detail how IDS calculated the 3,100 customer figure and the 297 customer figure set forth on page 62, lines 9-13 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

However, by using the monthly loss reports provided by BellSouth, IDS can create a spreadsheet which depicts the losses by months

During the months of Nov Dec 200 and Jan and Feb 2001 IDS lost 12594 lines or approximately 3598 customers.

The 297 customer figure can be arrived at by looking at the active date with IDS and the loss date. If this date is within 0 to 10 days after the completion due date and there was a conversion related disruption, these customers likely contacted BellSouth and requested that either the pending order to switch to IDS be cancelled or if already converted that the services be switched back to BellSouth. Hence before the first invoice was sent by IDS.

41. REQUEST Please explain in detail how IDS calculated the 2,000 failure figure set forth on page 62, lines 22-23 of Mr. Kramer's prefiled direct testimony.

RESPONSE: This information may be obtained by reviewing IDS' trouble tickets which are in turn initiated with BellSouth's repair center.

42. REQUEST Please explain in detail how IDS calculated the 10,000 access line figure set forth on page 62, lines 22-23 of Mr. Kramer's prefiled direct testimony.

RESPONSE: In response to No 40 above, one can calculate the approximate number of customers (3598 accounts is an approximation derived from the 12594 lines figure)

43 REQUEST. Please state the amount of the "acquisition cost" referenced on page 63, line 1 of Mr. Kramer's prefiled direct testimony and explain in detail how IDS calculated this amount.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

44 REQUEST Please identify with specificity each and every "win-back program" referenced on page 64, lines 8-10 of Mr. Kramer's prefiled direct testimony.

RESPONSE: Please refer to BellSouth's response to Staff's First Set of Interrogatories Item No. 2 for specific documentation regarding all but the Advantage Plus program.

Full Circle Program; Full Circle 2001; Advantage Plus program currently in place. Key Customer Program currently in place and due to expire June 25, 2001 which is specifically for "business customers served from wire centers in competitive situations".

45. REQUEST: For each program identified in response to Interrogatory 44, please state whether IDS contends that the program is priced below cost.

RESPONSE: Yes. IDS contends that the Full Circle Program, Full Circle 2001, Advantage Plus and the Key Customer Program are priced below cost.

46. REQUEST: For each such program that IDS contends is priced below cost, please explain in detail the basis for IDS' contention.

RESPONSE The resale discount is by law to consist of costs that are avoided by BellSouth. Therefore, any discount below the resale discount would necessarily be below cost based on BellSouth's own resale cost studies.

47. REQUEST. Please set forth all facts supporting the contention set forth on page 65, lines 13-14 of Mr. Kramer's prefiled direct testimony.

RESPONSE: Any and all customers who received a disconnection "win-back" letter from BellSouth as a result of the conversion to IDS, and whose CSR was not updated upon receipt of said letter would fall within the scope of this violation.

Simply stated, until such time as a conversion is complete, BellSouth's retail division is not supposed to have knowledge of said conversion. If the LENS CSR is not updated and the conversion is still in a pending service order status, one can reasonably conclude that the order had not completed therefore the customer should not receive a letter from BellSouth's retail division. If the customer does receive a letter from BellSouth's retail division, CPNI has necessarily been violated.

48. REQUEST: Please set forth all facts supporting the contention set forth on page 65, lines 21-22 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

On more than one occasion BellSouth has made changes to LENS without the proper and timely notice to IDS.

IDS will provide a letter dated January 29, 2001 from Bill Thrasher to Keith Kramer admitting that LENS had been updated etc. BellSouth provided no notice whatsoever of these changes. As such, IDS had no way of foreseeing or preparing for the disruptions these changes would have in IDS' ability to provision orders and service customer inquiries leaving end-users vulnerable and unable to have every day repair troubles or customer inquiries resolved timely and efficiently.

49. REQUEST. Please set forth all facts supporting the contention set forth on page 67, lines 3-4 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

IDS will produce a complaint to the Florida PSC and BellSouth's response to said complaint. This is an example of how BellSouth deliberately and without notice disconnects a customer who has ADSL with BellSouth.net or any other ISP on a line provisioned on UNE-P by IDS.

In its own response to the FPSC, BellSouth stated that the ADSL service should be converted to resale without having to contact the ADSL group.

BellSouth's will disconnect a customer's ADSL service without notice to the customer and when the customer contacts BellSouth, he is told that because the line is an IDS line, BellSouth can no longer provide ADSL over said line unless the customer converts that line and in some cases the customer's entire telephone services back to BellSouth.

This misrepresentation implies that due to the customer choosing IDS as its preferred local carrier that BellSouth cannot provide this service which the customer has now come to rely on for his business. Unwittingly these customer become desperate to have service restored and have little alternative but to acquiesce and convert the line and in some cases their entire telephone services back to BellSouth.

Most recently, BellSouth has begun a practice of disconnecting ADSL services to customers while IDS attempts to convert the ADSL line from UNE-P to 1FB. Mr. Greg Follensbee of BellSouth gave IDS notice that if IDS does not convert several customers UNE-P lines serving ADSL to resale (1FB) status, BellSouth will disconnect those customer's ADSL service.

While IDS has worked vigorously to convert these lines to resale status over the past month, BellSouth has consistently brought down several customer's ADSL service when processing the conversion despite clarifications to make sure the orders flow through error free.

50. REQUEST: Please set forth all facts supporting the contention set forth on page 67, lines 5-6 of Mr. Kramer's prefled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

In various conversions, and despite error free orders being processed, BellSouth will remove the Hunting feature on a customer's services.

The net effect of this negligence is to cause a customer who requires multiple lines to appear as if the lines are busy because there is no number for calls to roll over to.

Example: If a customer has a main BTN and five lines on Hunt Group and the Hunting feature is removed, the lines cease to roll over and the telephone appears busy. If this conversion related disruption is not corrected, the end-user (IDS customer) cannot operate his business effectively

51. REQUEST: Please explain how IDS developed the 40% figure set forth on page 69, lines 6-10 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS believes that 40% of the total monies paid to BellSouth by IDS during the period between April 1999 and the date of filing the complaint on May 11, 2001 is an appropriate measure of the impact that BellSouth's failure to perform its contractual obligations to provide OSS and UNE-P to IDS at parity.

52. REQUEST: Please itemize with particularity each and every one of the "serious damages" alleged on page 70, lines 7-11 of Mr. Kramer's prefiled direct testimony and for each such damage, please set forth the monetary amount of such damage and explain in detail how IDS calculated that amount.

RESPONSE:

1) Loss of customers as a result of win-back programs. Failure to provide IDS with OSS and UNE-P at parity with what BellSouth offers it's like retail customers.

2) Damages to IDS' reputation as a competent provider of local telecommunication services.

3) Loss of revenue and decrease in equity valuation of IDS.

53. REQUEST: With regard to page 4, lines 5-7 of Mr. Hamilton's prefiled direct testimony, has IDS ever sought an explanation from BellSouth as to how IDS can participate in "any of these win-back promotions?" If so, please state who at IDS sought this explanation, from whom at BellSouth such explanation was requested, and any response to the request that was provided by BellSouth.

RESPONSE: See response to Interrogatory No. 36.

54. REQUEST: Please explain in detail how IDS conducted the polling referenced on page 6, lines 9-18 of Mr. Hamilton's prefiled direct testimony

RESPONSE: IDS called customers whose orders were being cancelled or who otherwise appeared on the loss reports provided by BellSouth.

55 REQUEST Please identify the customers who were polled by IDS' Customer Relationship Management Team (CRM) as referenced on page 6, lines 9-18 of Mr. Hamilton's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth

56 REQUEST: With regard to the statement on page 6, lines 9-14 that "most of the customers that were polled" responded as indicated, please state how many customers were polled, how many customers responded to the poll, and how many of those customers that responded to the poll provided responses consistent with lines 12-14 of Mr. Hamilton's prefiled testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

57 REQUEST. Please explain in detail all facts supporting the assertions set forth on page 11, lines 11-15 of Mr. Hamilton's prefiled testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

New conversions provisioned "as is" from BellSouth Retail to IDS resale or UNE-P never require a "truck roll" or technician to visit the customer premise.

The activity to convert the services is performed remotely in translations. When a technician arrives, unannounced, at a customer premise and is asked what he is there for, the technician responds that he is there to disconnect NOT convert the customer's telephone service pursuant to an order submitted by IDS.

This is patently false and is designed to scare the customer into believing that the services are somehow different than that provided by BellSouth.

The effect is that the customer dismisses the technician and a "Missed Appointment" notice is provided to IDS effectively canceling an order

to convert that never required the technician to visit the customer premise.

58 REQUEST: Please identify each and every IDS customer that has questioned a BellSouth technician as to "why they are there" and that has had the BellSouth technician explain that they have an order from IDS to "disconnect their phones" as alleged on page 11, lines 11-15 of Mr. Hamilton's prefiled testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

Any and all new customer conversion that BellSouth dispatched a technician likely questioned the technician about why they were there. Each of these new customer's fully expected to have a seamless transition and never expected a technician to visit them and state that IDS had order their services disconnected.

BellSouth has in its possession records concerning each and every conversion order with a corresponding truck roll or technician visit attached to it. This listing will identify each customer who IDS contends questioned the BellSouth technician.

59. REQUEST. Please identify each customer and each telephone line (by telephone number) whose Watch Alert has stopped functioning when IDS converted lines with Watch Alert to UNE-P as alleged at page 13, lined 9-19 of Mr. Hamilton's prefiled testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

IDS cannot identify with specificity each and every customer who had Watch Alert the time the conversion to IDS UNE-P took place. However, any customer who did have Watch Alert when the conversion to IDS UNE-P took place may be part of this list.

BellSouth has records concerning all customers who converted to IDS UNE-P and had Watch Alert at the time of the conversion.

BellSouth's systems are supposedly designed to clarify UNE-P orders with Watch Alert so that IDS may change the order from UNE-P to Resale for that line only.

61. REQUEST. With regard to each affidavit attached to his prefiled direct testimony please explain in detail how Mr. Leior "personally obtained" these affidavits as set forth on page 2, lines 17-19 of his testimony.

RESPONSE: Because of the sheer amount of conversion related disruptions that had occurred and were occurring on a daily basis, IDS instructed its Customer Service Representatives to inform Mr. Leiro via e-mail whenever a customer called concerning a service disruption.

Mr. Leiro researched and documented each instance, called the customers and asked if they would be willing to sign an affidavit explaining their experience when converting to IDS from BellSouth in as much detail as possible for, not only a potential formal complaint against BellSouth, but also to assist the FPSC in its investigation of anticompetitive behavior by BellSouth.

Another method of obtaining these affidavits was to review a sample of customers who converted during a given period of time, review these accounts in the billing program and review the customer notes. If the customer notes revealed that the customer contacted IDS with a conversion related problem, Mr. Leiro would likewise research and document the order, contact the customer and ask if they would cooperate by signing an affidavit of their experience.

Mr. Leiro, with the guidance of IDS attorney, would then prepare the affidavit and send the draft to the customer until they were satisfied with the contents at which time they were instructed to obtain a Notary Public and if one was not available to them, Mr. Leiro would, whenever practical, Notarize the signature himself being that he is a Notary Public.

61. REQUEST: Please identify IDS customer that have received communications from BellSouth telemarketers to the effect that IDS is going bankrupt, is going out of business, or is an unreliable provider of telecommunications services as alleged on page 5, lines 9-12 of Mr. Leiro's prefiled direct testimony.

RESPONSE: It is impossible to ascertain exactly how many and which customers BellSouth misrepresented that IDS was going bankrupt or out of business. However, aside from the customer affidavits attached to IDS' complaint reflecting that IDS was "going bankrupt" or "going out of business", IDS will provide all other affidavits documents and names of customers in its possession whom an affidavit was not provided but who IDS has documentation concerning the misrepresentations.

Furthermore, BellSouth's own full-page advertisements which ran for several months clearly imply that if a customer switches its telephone services from BellSouth to a competitive local exchange carrier, there services are somehow unreliable or inferior to that which is provided by BellSouth when in fact it is BellSouth itself who provides the very services it disparages in its ads.

62. REQUEST: Without limiting the scope of any other request, and given that three phrases on page 5, lines 9-12 of Mr. Leiro's prefiled direct testimony are set forth in quotation marks, please state whether this portion of Mr. Leiro's testimony is based, in whole or in part, on any recordings, notes, or other documents purporting to set forth or summarize such phrases. If it is, please identify and describe each such recording, set of notes, or other document.

RESPONSE: In only some cases is the testimony on page 5 lines 9-12 or Mr. Leiro's prefiled direct testimony based in whole or in part on notes or documents. All others are based on telephone conversations with the customer and subsequent written affidavits which will be provided pursuant to the response to Interrogatory No. 61 above.

63. REQUEST: With regard to page 10, lines 13-18 of Mr. Kramer's prefiled direct testimony, please identify the two IDS employees and the telephone numbers of the lines that were involved in the BETA-tests, describe in detail how IDS performed the BETA-tests, describe in detail the results of the BETA-test, and set forth all facts supporting the assertion that the service outages were caused by BellSouth.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

However, the employees were Fabio Galoppi and Minor Oquendo

64. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 11, lines 10-17 of Mr. Kramer's prefiled direct testimony.

RESPONSE: The assertions set forth in Mr. Kramer's prefiled direct testimony on page 11, lines 10-17 are not based on any documentation but rather is based on his personal experience with these individuals and the actual events that transpired during that time period

65. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 12, lines 2-3 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

66. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 12, lines 12-20 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

67. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 13, lines 6-14 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

68. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 13, lines 22-23 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

69. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 14, lines 13-17 of Mr. Kramer's prefiled direct testimony.

RESPONSE: Aside from documentation related specifically to the Beta-testing issue which will be provided accordingly, IDS does not currently have documents specifically in response to the new USOC provided by Mr. Gulas at the time. However should any documentation relative to this Interrogatory become available it will be made available prior to or at the hearing in this matter.

70. REQUEST. Please identify and describe any documents related to the BETA-tests referenced on page 14, lines 17-19 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

71. REQUEST Please identify and describe any documents that support or that are related to the assertions set forth on page 15, lines 5-17 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

72. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 16, lines 3-6 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

73. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 16, lines 10-13 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

74. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 17, lines 8-18 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

75. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 17, lines 20-23 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

76. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 16, lines 16-18 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS does not currently have documents responsive to this request however should any documentation relative to this Interrogatory become available it will be made available prior to or at the hearing in this matter.

77. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 21, lines 7-8 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

78. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 21, lines 13-14 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

79. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 23, lines 16 through page 24, line 8 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

80. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 26, lines 13-15 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

81. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 26, lines 17-21 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

82. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 27, lines 10-13 of Mr. Kramer's prefiled.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

83. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 29, lines 3-6 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

84. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 29, lines 16-17 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

85. REQUEST. Please identify and describe any documents that support or that are related to the assertions set forth on page 35, lines 8-113 of Mr. Kramer's prefiled direct testimony

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth

86. REQUEST. Please identify and describe any documents that support or that are related to the assertions set forth on page 38, lines 7-14 of Mr. Kramer's prefiled direct testimony.

RESPONSE. IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth

87. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 44, lines 10-12 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth

88. REQUEST. Please identify and describe any documents that support or that are related to the assertions set forth on page 44, lines 18-19 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth

89. REQUEST. Please identify and describe any documents that support or that are related to the assertions set forth on page 44, lines 10-12 of Mr. Kramer's prefiled direct testimony.

RESPONSE: This Interrogatory is a duplicate of No. 87.

90 REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 44, lines 18-19 of Mr. Kramer's prefiled direct testimony.

RESPONSE: This Interrogatory is a duplicate of No. 88.

91. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 46, lines 3-5 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth

92. REQUEST: Please identify and describe any documents that support or that are related too the assertions set forth on page 47, lines 17-20 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

93 REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 48, lines 8-11 of Mr. Kramer's direct testimony.

RESPONSE:IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

94 REQUEST: Please identify and describe any documents that support or that are related to IDS' conclusion that is set forth on page 49, lines 3-4 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

Additionally, in response to this Interrogatory, IDS directs BellSouth to its own IDS conversion active dates and IDS' loss date reports for the month of December 2000. These documents will provide the evidence of the Mr. Kramer's prefiled direct testimony on page 49, lines 13-16.

95 REQUEST: Please identify and describe any documents that support or that are related to IDS' determination that at least 200 accounts it put in for conversion in December 2000 had gone back to BellSouth during the conversion process, as alleged on page 49, lines 13-16 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

96. REQUEST. Please identify and describe any documents that support or that are related to Id's "discovery" that is set forth on page 49, lines 18-19 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

97. REQUEST. Please identify and describe any documents that support or that are related to the assertions set forth on page 50, lines 14-17 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

98. REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 50, lines 21-23 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

99 REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 51, line 14 through page 52, line 9 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

100.REQUEST: Please identify and describe any documents that support or that are related to the 1,000 lines a day figure set forth on page 59, lines 10-11 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

101.REQUEST: Please identify and describe all documents that support or that are related to the assertion set forth on page 61, lines 14-16 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

102.REQUEST: Please identify and describe all documents that support or that are related to the assertions set forth on page 11, lines 11-15 of Mr. Kramer's prefiled direct testimony.

RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

103.REQUEST: Please identify and describe any documents that support or that are related to the assertions set forth on page 56, lines 21-23 of Mr. Kramer's prefiled direct testimony.

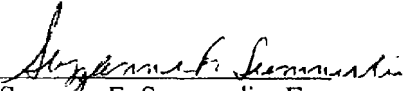
RESPONSE: IDS has not had the resources to collect all of records, notes, correspondence that it may have in its possession. If and when IDS has this document compiled it will provide them to BellSouth.

CERTIFICATE OF SERVICE
Docket No. 010740-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (*) and sent via Federal Express 2nd day of August, 2001 to the following.

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*Signed in the absence of
it cleared Kelly.*