

ORIGINAL

Legal Department

Lisa S. Foshee  
General Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0754

August 23, 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

COMMISSION  
CLERK

01 AUG 23 PM 4: 34

RECEIVED-FPSC

Re: 960786-TL (Section 271)

Dear Ms. Bayó:

Today BellSouth Telecommunications, Inc. filed its Objections to Florida Public Service Commission Staff's Second Request for Production of Documents dated August 16, 2001, 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 by Hand Delivery and Federal Express as shown on the attached Certificate of Service.

Sincerely,

*Lisa S. Foshee*  
Lisa S. Foshee (KA)

Enclosures

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

APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
LEG \_\_\_\_\_  
OPC \_\_\_\_\_  
PAI \_\_\_\_\_  
RGO \_\_\_\_\_  
SEC   I    
SER \_\_\_\_\_  
OTH \_\_\_\_\_

RECEIVED FILED  
*RXM*  
\* BY MAIL \*  
\* BY MAIL \*

DOCUMENT NUMBER-DATE

10518 AUG 23 01

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 960786-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Hand Delivery (\*) and Federal Express this 23rd day of August, 2001 to the following:

Mr. Brian Sulmonetti (+)  
LDDS WorldCom Communications  
Suite 3200  
6 Concourse Parkway  
Atlanta, GA 30328  
Tel. No. (770) 284-5493  
Fax. No. (770) 284-5488  
[brian.sulmonetti@wcom.com](mailto:brian.sulmonetti@wcom.com)

Charles J. Beck  
Office of Public Counsel  
111 W. Madison Street  
Suite 812  
Tallahassee, FL 32399-1400  
Tel. No. (850) 488-9330  
Fax No. (850) 488-4992  
[Beck.Charles@leg.state.fl.us](mailto:Beck.Charles@leg.state.fl.us)

Floyd R. Self, Esq. (+)  
Messer Law Firm  
215 South Monroe Street  
Suite 701  
P.O. Box 1876  
Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Represents LDDS/ACSI  
[fself@lawfla.com](mailto:fself@lawfla.com)

Richard D. Melson (+)  
Hopping Green Sams & Smith  
123 South Calhoun Street  
P.O. Box 6526  
Tallahassee, FL 32314  
Tel. No. (850) 222-7500  
Fax. No. (850) 224-8551  
Represents MCI, Rhythms  
[RMelson@hgss.com](mailto:RMelson@hgss.com)

Vicki Gordon Kaufman (+)  
Joseph A. McGlothlin (+)  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Represents FCCA  
Represents NewSouth  
Represents KMC  
Represents NuVox Comm.  
Represents ACCESS  
Represents XO  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

Susan S. Masterton (+)  
Sprint Communications Co.  
Post Office Box 2214 (zip 32316-2214)  
1313 Blair Stone Road  
Tallahassee, FL 32301  
Tel. (850) 599-1560  
Fax (850) 878-0777  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

Beth Keating, Staff Counsel (\*)  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6212  
Fax. No. (850) 413-6250  
[bkeating@psc.state.fl.us](mailto:bkeating@psc.state.fl.us)

Scott Sapperstein  
Intermedia Comm., Inc.  
One Intermedia Way  
MCFLT-HQ3  
Tampa, Florida 33647-1752  
Tel. No. (813) 829-4093  
Fax. No. (813) 829-4923  
[Sasapperstein@intermedia.com](mailto:Sasapperstein@intermedia.com)

Rhonda P. Merritt  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6342  
Fax. No. (850) 425-6361  
[rpmerritt@ATT.com](mailto:rpmerritt@ATT.com)

Kenneth A. Hoffman, Esq. (+)  
Rutledge, Ecenia, Underwood,  
Purnell & Hoffman, P.A.  
215 South Monroe Street  
Suite 420  
P.O. Box 551  
Tallahassee, FL 32302  
Tel No. (850) 681-6788  
Fax. No. (850) 681-6515  
Represents TCG  
Represents US LEC  
[Ken@Reuphlaw.com](mailto:Ken@Reuphlaw.com)

John R. Marks, III  
215 South Monroe Street  
Suite 130  
Tallahassee, FL 32301  
Tel. (850) 222-3768  
Fax. (850) 561-0397  
Represents BellSouth  
[JohnM@KMRlaw.com](mailto:JohnM@KMRlaw.com)

Kenneth S. Ruth  
Florida Director CWA  
2180 West State Road 434  
Longwood, FL 32779  
Tel. (407) 772-0266  
Fax. (407) 772-2516  
[Kruth@cwa-union.org](mailto:Kruth@cwa-union.org)  
Marilyn H. Ash

MGC Communications, Inc.  
3301 N. Buffalo Drive  
Las Vegas, NV 89129  
Tel. No. (702) 310-8461  
Fax. No. (702) 310-5689

Rodney L. Joyce  
Shook, Hardy & Bacon, L.L.P.  
600 14th Street, N.W.  
Suite 800  
Washington, D.C. 20005-2004  
Tel. No. (202) 639-5602  
Fax. No. (202) 783-4211  
[rjoyce@shb.com](mailto:rjoyce@shb.com)  
Represents Network Access Solutions

Michael Gross/Charles Dudley (+)  
FCTA, Inc.  
246 E. 6th Avenue  
Suite 100  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

Nanette Edwards  
ITC^DeltaCom  
4092 South Memorial Parkway  
Huntsville, AL 35802  
Tel. No. (256) 382-3856  
Fax. No. (256) 382-3969  
Represented by Hopping Law Firm

Donna McNulty  
MCI WorldCom  
325 John Knox Road  
Suite 105  
Tallahassee, FL 32303-4131  
Tel. No. (850) 422-1254  
Fax. No. (850) 422-2586  
[donna.mcnulty@wcom.com](mailto:donna.mcnulty@wcom.com)

Network Access Solutions Corp.  
100 Carpenter Drive  
Suite 206  
Sterling, VA 20164  
Tel. No. (703) 742-7700

Fax. No. (703) 742-7706  
Represented by Shook, Hardy & Bacon

Karen Camechis (+)  
Pennington Law Firm  
215 South Monroe Street  
2<sup>nd</sup> Floor  
Tallahassee, FL 32301  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126  
Represents Time Warner  
[pete@penningtonlawfirm.com](mailto:pete@penningtonlawfirm.com)

Rhythms Links, Inc.  
6933 South Revere Parkway  
Suite 100  
Englewood, CO 80112  
Tel. No. (303) 476-4200  
Represented by Hopping Law Firm

Benjamin Fincher  
Sprint/Sprint-Metro  
3100 Cumberland Circle  
#802  
Atlanta, GA 30339  
Tel. No. (404) 649-5144  
Fax. No. (404) 649-5174  
Represented by Ervin Law Firm

Carolyn Marek  
Time Warner  
Regulatory Affairs, SE Region  
233 Bramerton Court  
Franklin, TN 37069  
Tel. No. (615) 376-6404  
Fax. No. (615) 376-6405  
[carolyn.marek@twtelecom.com](mailto:carolyn.marek@twtelecom.com)  
Represented by Pennington Law Firm  
Represented by Parker Poe Adams

James Falvey  
ACSI  
131 National Business Parkway  
Annapolis Junction, MD 20701  
Represented by Messer Law Firm

Matthew Feil (+)  
Florida Digital Network, Inc.  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801  
Tel. No. (407) 835-0460  
[mfeil@floridadigital.net](mailto:mfeil@floridadigital.net)

Michael Sloan (+)  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007-5116  
Tel. No. (202) 295-8458  
Fax No. (202) 424-7645  
Represents FDN  
[mcsloan@swidlaw.com](mailto:mcsloan@swidlaw.com)

Katz, Kutter Law Firm (+)  
Charles J. Pellegrini/Patrick Wiggins  
106 E. College Avenue  
Tallahassee, FL 32301  
Tel. No. 850-224-9634  
Fax. No. 850-224-9634  
[pkwiggins@katzlaw.com](mailto:pkwiggins@katzlaw.com)

Lori Reese  
Vice President of Governmental Affairs  
NewSouth Communications  
Two Main Street  
Greenville, South Carolina 29609  
Tel. No. (864) 672-5177  
Fax. No. (864) 672-5040  
[lreese@newsouth.com](mailto:lreese@newsouth.com)

Genevieve Morelli  
Andrew M. Klein  
Kelley Drye & Warren LLP  
1200 19th Street, NW  
Suite 500  
Washington, DC 20036  
Represents KMC

**John D. McLaughlin, Jr.**  
**KMC Telecom**  
**1755 North Brown Road**  
**Lawrenceville, Georgia 30043**

**Suzanne F. Summerlin, Esq.**  
**1311-B Paul Russell Road**  
**Suite 201**  
**Tallahassee, Florida 32301**  
**Tel. No. (850) 656-2288**  
**Fax. No. (850) 656-5589**  
**Represents IDS Telecom**

**Henry C. Campen, Jr. (+)**  
**Parker, Poe, Adams & Bernstein, LLP**  
**P.O. Box 389**  
**First Union Capital Center**  
**150 Fayetteville Street Mall**  
**Suite 1400**  
**Raleigh, NC 27602-0389**  
**Tel. No. (919) 890-4145**  
**Fax. No. (919) 834-4564**  
**Represents US LEC of Florida**  
**Represents NuVox Comm.**  
**Represents XO**  
**Represents Time Warner**

**Catherine F. Boone**  
**Covad Communications Company**  
**10 Glenlake Parkway, Suite 650**  
**Atlanta, Georgia 30328-3495**  
**Tel. No. (678) 222-3466**  
**Fax. No. (678) 320-0004**  
**[cboone@covad.com](mailto:cboone@covad.com)**

**Bruce Culpepper, Esq.**  
**Akerman, Senterift & Eidson**  
**301 South Bronough Street**  
**Suite 200**  
**Post Office Box 10555**  
**Tallahassee, FL 32302-2555**  
**Attys. for AT&T**

**Mark D. Baxter**  
**Stone & Baxter, LLP**  
**557 Mulberry Street**  
**Suite 1111**  
**Macon, Georgia 31201-8256**  
**Represents ACCESS**

Dana Shaffer  
XO Communications, Inc.  
105 Molloy Street, Suite 300  
Nashville, Tennessee 37201-2315  
Tel. (615) 777-7700  
Fax. (615) 345-1564  
dana.shaffer@xo.com  
Represented by Parker Poe Adams

*Lisa S. Foshee*

Lisa S. Foshee (LA)

**(+) Signed Protective Agreement**