

AKERMAN SENTERFITT & EIDSON DISTRIBUTION CENTER

ATTORNEYS AT LAW

01 SEP 20 AM 8:49

SUNTRUST INTERNATIONAL CENTER
ONE SOUTHEAST THIRD AVENUE, 28TH FLOOR
MIAMI, FLORIDA 33131-1714
PHONE (305) 374-5600 • FAX (305) 374-5095
http://www.akerman.com

ORIGINAL

September 18, 2001

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

RECEIVED-PPSC
01 SEP 20 AM 9:35
COMMISSION
CLERK

Re: Docket No. 010740-TP (IDS)

Dear Ms. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc's Motion to Quash Subpoena Duces Tecum for Deposition or in the Alternative, Motion for Protective order, which we ask you to file in the captioned docket.

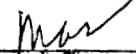
A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,


Douglas L. O'Keefe

APP
CAF
CMP
COM
CTR
ECR
LEG
OPC
PAI
RGO
SEC
SER
OTH
MI705896:1
Cover pg

RECEIVED & FILED


PPSC-BUREAU OF RECORDS

DOCUMENT NUMBER DATE
11725 SEP 20 01
WEST PALM BEACH
PPSC-COMMISSION CLERK

AKERMAN, SENTERFITT & EIDSON, P.A.

FORT LAUDERDALE • JACKSONVILLE • ORLANDO • TALLAHASSEE • TAMPA

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

**IDS LONG DISTANCE, INC. n/k/a IDS TELECOM, L.L.C.'S RESPONSE TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS and SECOND SET OF INTERROGATORIES**

IDS Long Distance, Inc. n/k/a IDS Telecom, L.L.C., ("IDS"), through the undersigned counsel, responds BellSouth Telecommunications, Inc.'s ("BellSouth") Second Request for Production of Documents and Interrogatories as follows:

General Objection

IDS objects to BellSouth's definition of IDS as it purports to include persons and entities that that are not under the control of IDS.

REQUESTS FOR PRODUCTION

21. Please produce any documents relating to issues or claims set forth in IDS' Complaint against BellSouth or in the testimony IDS has prefiled in this docket that IDS has provided to the Office of the Attorney General for the State of Florida.

Response:

IDS objects to this request as it is overly broad.

Without waiving this objection IDS refers BellSouth to documents previously produced.

22. Please produce all documents related to BellSouth's Full Circle Promotion or related to BellSouth's sales and marketing of that promotion that IDS has provided to any third party.

Response:

Responsive documents, if any, were previously produced.

23. Please produce all documents related to BellSouth's Full Circle Promotion or related to Bell South's sales and marketing of that promotion that IDS has received to any third party.

Response:

Responsive documents are attached.

24. Please produce copies of all contracts between any entity identified in response to Interrogatory No. 104 and any person or entity identified in Interrogatory 105, including without limitation any contracts for or related to the submission of UNE-P conversion orders to BellSouth.

Response:

No responsive documents are in the possession, custody or control of IDS. To the extent responsive documents exist, they would be in the possession custody or control of Unified Solutions, Inc. or other entities that are not parties to this proceeding and are not controlled by IDS.

25. Please produce copies of any correspondence between any entity identified in response to Interrogatory No. 104 and any person or entity identified in Interrogatory 105 that are related to the submission of UNE-P conversion orders to BellSouth.

Response:

No response documents are in the possession, custody or control of IDS. To the extent responsive documents exist, they would be in the possession custody or control of Unified Solutions, Inc. or other entities that are not parties to this proceeding and are not controlled by IDS.

26. Please produce all bills sent by any entity identified in response to Interrogatory No. 104 and any person or entity identified in Interrogatory 105 that are related to the submission of UNE-P conversion orders to BellSouth.

Response:

No responsive documents are in the possession, custody or control of IDS. To the extent responsive documents exist, they would be in the possession custody or control of Unified Solutions, Inc. or other entities that are not parties to this proceeding and are not controlled by IDS.

INTERROGATORIES

104. Please identify any of IDS' subsidiaries or affiliates that submit UNE-P conversion order to BellSouth on behalf of any other person or entity.

Response:

Unified Solutions, Inc. may be considered an affiliate of IDS, although IDS does not control this entity.

105. Please identify any person or entity that has retained, employed, or contracted with any entity identified in response to Interrogatory No. 104 to submit UNE-P conversion orders on their behalf to BellSouth.

Response:

IDS objects to this interrogatory as it seeks information that is neither relevant nor reasonably calculated to lead to discoverable evidence. Further, and without waiving this objection, IDS states that to the extent that any officer or employee of IDS has responsive information, such information is protected by confidentiality agreements and may not be disclosed to BellSouth.

106. Identify the total amount that IDS' subsidiaries or affiliates have billed or charged the persons or entities identified in response to Interrogatory No. 104 for the submission of UNE-P conversion orders on their behalf to BellSouth.

Response:

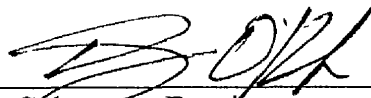
IDS is not in the possession or control of the requested information.

107. For each person or entity identified in response to Interrogatory No. 105, please: (a) state the date each entity identified in response to Interrogatory No. 104 began to submit UNE-P conversion orders to BellSouth on behalf of such person or entity; and (b) for each subsequent month, please identify the number of UNE-P conversion orders that each entity

identified in response to Interrogatory No. 104 submitted to BellSouth on behalf of such person or entity.

Not applicable.

Respectfully submitted,



Bruce Culpepper, Esquire
AKERMAN, SENTERFITT & EIDSON, P.A.
301 South Bronough Street, Suite 200
Post Office Box 10555
Tallahassee, Florida 32302-2555
Phone: (850) 222-3471
Fax: (850) 222-8628


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Brian Miller
Douglas O'Keefe
AKERMAN, SENTERFITT & EIDSON, P.A.
SunTrust International Center, 28th Floor
One Southeast Third Avenue
Miami, Florida 33131-1704
Phone: (305) 374-5600
Fax: (305) 374-5095

CERTIFICATE OF SERVICE


I certify that a copy of the foregoing response to BellSouth Telecommunications, Inc.'s Second Request for Production of Documents and Interrogatories was delivered via facsimile and U.S. Mail this 14th day of September, 2001, to:

Mary Anne Helton
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
(850) 413-6096
mhelton@psc.state.fl.us

Patrick W. Turner, Esq.
James Meza III, Esq.
Nancy B. White, Esq.
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301



Douglas L. O'Keefe

 **BELLSOUTH**
REGIONAL WINBACK CENTER
 3300 WEST ESPLANADE AVE
 SUITE 307
 METairie, LA 70002

TOLL FREE 888 201-2056 Fax 888 201-2057
 LOCAL 504 846-3845 Local Fax 504 846-3770

Fax

To: [REDACTED]	From: [REDACTED]
Acct: [REDACTED]	Phone: 1 888 201 2056 [REDACTED]
Phone:	Fax: 1 888 201-2057
Fax: [REDACTED]	Date: 7-23-01
Re: Winback	CC:

Urgent
 For Review
 Please Comment
 Please Reply
 Comment.

Please complete forms and return to 888 201-2057

***** PLEASE LIST CURRENT CLEC ON BUSINESS LINE SERVICE REQUEST FORM *****

THANK YOU FOR CHOOSING BELLSOUTH !

• • ALLOW 2 TO 6 WEEKS FOR YOUR WINBACK PROCESS TO COMPLETE • •

Please complete ALL the required information on the Letter of Agency including the following:

- | | |
|--|-----------------|
| 1. Account Number | 5. Name (Print) |
| 2. Account Name | 6. Signature |
| 3. Bill Address | 7. Date |
| 4. List all Tel. Nos. coming back to BellSouth | |

The Letter Of Agency is a legal document. If a mistake is made, line out the erroneous information, add the correct information and initial the correction. The printed material on this form should not be deleted or altered.

If you need more space to list all your telephone numbers you can write "see attached" in the space that reads "Telephone Number(s) covered by this change request". Then write all telephone numbers on a separate sheet of paper; please date and sign the attachment.

Phyllis Jackson

Page 1

Letter of Agency¹

Account Number:
 (Required)
 Account Billing Name:
 (Required)
 Billing Address:
 (Required)

Telephone Numbers covered by this change request:

(Required - Indicate if complete or partial) writeback - If partial advise disposition of remaining service - If necessary attach separate document with all telephone numbers; this also must be signed and dated by customer

This letter is to provide authorization to:
 (Please check all that are applicable)

- change local exchange carrier to BellSouth
- change Intra-LATA long distance carrier to BellSouth
- freeze Intra-LATA long distance carrier to _____
- freeze Inter-LATA long distance carrier to _____
- freeze local exchange carrier to _____

I understand that I may select only one primary Intra-LATA long distance carrier, one primary local exchange carrier, and one primary Inter-LATA long distance carrier for any telephone number. I also understand that the primary Inter-LATA long distance carrier may be different from the primary Intra-LATA long distance carrier or primary local exchange carrier and that the primary Intra-LATA long distance carrier may be different from the primary local exchange carrier.

I further understand that there may be a charge for each provider change and could involve a charge in changing back to the previous primary carrier.

I have elected to subscribe to the _____
 (Name of product or service that is being promised or offered in exchange for the switch)

This service _____
 (Include a description of any and all terms, conditions or charges that will be incurred)

I am authorized to request changes on this account.

 Name (Printed)

 Signature

(Required)
 This signature will result in a change of your provider

Date:
 12-5-88

¹ All other except Telephones

REGIONAL WINBACK CENTER CREDIT INFORMATION

BILLING NAME _____

BILLING ADDRESS _____

OTHER BELLSOUTH SERVICE _____

SPECIAL BILLING INSTRUCTIONS _____

TYPE BUSINESS:

SOLE OWNER ()
NAME _____

CONTACT NUMBER _____

SOCIAL SECURITY NUMBER _____

PARTNERSHIP ()
NAME _____

CONTACT NUMBER _____

SOCIAL SECURITY NUMBER _____

NAME _____

CONTACT NUMBER _____

SOCIAL SECURITY NUMBER _____

LIMITED LIABILITY CORP ()
CORPORATION ()
OFFICER _____

OFFICER _____

CORPORATE TAX I.D. _____

SOCIAL SECURITY NUMBER _____

SOCIAL SECURITY NUMBER _____

RESPONSIBLE PARTY FOR BILL

NAME _____

CONTACT NUMBER _____

Basic Exchange Service Product Pricing Guide

State		FL	GA	NC	SC	TN	KY	AL	LA	MS	Features
Rate Group		12	12	10	7	3	3	0	0	13	
Description	USOC										
Hunting	HTG	\$10.00	\$23.95	\$13.88	\$10.85	\$29.78	\$9.70	\$10.00	\$16.60	\$10.00	
Flat Rate Business Line	1FB/PBC	\$29.55	\$48.30	\$33.95	\$42.75	\$39.70	\$35.25	\$38.23	\$33.00	\$39.95	Free LCA, \$10/min ECA, \$28 IntraLATA
Touch Tone Service						\$3.00					
MultiLine Exchange Access Addltns		\$4.78									
End User Common Line Charge	BZR	\$7.84	\$7.84	\$7.84	\$7.84	\$7.84	\$7.84	\$7.84	\$7.84	\$7.84	FDD Charge for Network Access
Local Number Portability	LNPCX	\$0.35	\$0.35	\$0.35	\$0.35	\$0.35	\$0.35	\$0.35	\$0.35	\$0.35	
Federal Universal Service	FUJMK	\$0.39	\$0.39	\$0.39	\$0.39	\$0.39	\$0.39	\$0.39	\$0.39	\$0.39	
Telecommunications Relay Svc	AHR	\$0.09	\$0.05	\$0.07	\$0.07		\$0.10	\$0.15	\$0.16	\$0.07	
Business Plus Option 1	BD1	\$64.10	\$83.30	\$84.00	\$73.00	\$84.00	\$62.90	\$68.00	\$64.00	\$84.00	120 hrs. Free Intra-Lata Calling/Line
Business Plus Option 2	BD2	\$35.10	\$64.30	\$40.44	\$48.75	\$45.70	\$38.90	\$43.00	\$40.00	\$42.50	\$0.08 per min. Intra-Lata calling
Complete Choice for Bus. (Opt. 1)	BC1	\$77.95	\$96.95	\$77.95	\$88.95	\$77.95	\$78.85	\$81.95	\$77.95	\$83.95	All Features including Hunting & BD1
Complete Choice for Bus. (Opt. 2)	BC2	\$48.95	\$67.95	\$63.95	\$81.95	\$58.95	\$52.85	\$58.95	\$53.95	\$61.95	All Features including Hunting & BD2
Flat Rate Bus. Line Total		\$42.98	\$56.83	\$42.90	\$51.40	\$51.28	\$43.93	\$44.98	\$41.74	\$45.60	
Bus. Plus Option 1 Total		\$72.76	\$91.93	\$72.85	\$81.66	\$72.58	\$71.69	\$76.73	\$72.74	\$72.65	
Bus. Plus Option 2 Total		\$43.78	\$82.93	\$49.08	\$57.40	\$54.28	\$47.68	\$53.73	\$48.74	\$51.16	
CCFB Opt 1 Total		\$86.61	\$105.68	\$88.60	\$96.60	\$88.63	\$86.63	\$88.68	\$86.69	\$92.60	*
CCFB Opt 2 Total		\$57.61	\$78.58	\$62.60	\$70.60	\$67.63	\$61.63	\$67.68	\$62.69	\$70.60	*
* Complete Choice for Business comes with Hunting and with any of the following features: Call Forward Busy Line, Call Forward Don't Answer, Call Forward Don't Answer Ring Control, Call Forward Variable, Flexible Call Forwarding, Call Waiting, Speed Calling B, Speed Calling 90, Three Way Calling, Message Waiting Indicator - Audible, Call Return, Call Block, Call Tracing, Repeat Dialing, Call Selector, Preferred Call Forwarding, RingMaster I, RingMaster II, Remote Access Call Forwarding, Three Way Calling with Transfer, Caller ID Number Delivery, Enhanced Caller ID with Call Management ACR, Caller ID Name and Number Delivery with ACR, Caller ID Name and Number Delivery - MultiLine Hunt Group, Surrogate Client Number, Flexible Call Forwarding with Audio Calling Name, Star 98 Access											
Pricing w/ Promotions:	State	FL	GA	NC	SC	TN	KY	AL	LA	MS	
1. Full Circle Winback	1FB	\$37.08	\$47.27	\$38.81	\$42.85	\$43.34	\$38.68	\$37.71	\$35.14	\$38.21	
36 months @ 20% off	BD1	\$64.72	\$78.27	\$59.66	\$67.05	\$62.78	\$59.00	\$63.13	\$59.84	\$59.66	
	BD2	\$36.74	\$52.07	\$41.00	\$47.65	\$48.14	\$38.90	\$44.73	\$40.74	\$42.05	
(Total Charges)	BC1	\$76.80	\$98.19	\$71.01	\$78.21	\$73.94	\$70.19	\$74.29	\$71.10	\$75.61	
	BC2	\$52.60	\$62.99	\$51.81	\$58.21	\$58.74	\$50.98	\$55.69	\$51.90	\$58.21	