

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition of US LEC of Florida )
Inc., Time Warner Telecom of Florida, LP )
and ITC^DeltaCom Communications )
objecting to and requesting )
suspension of proposed CCS7 )
Access Arrangement Tariff filed by )
BellSouth Telecommunications, Inc. )
\_\_\_\_\_ )

Docket No. 020129-TP

Filed: September 9, 2002

ITC^DELTACOM COMMUNICATIONS'
NOTICE OF SERVICE OF SUPPLEMENTAL RESPONSE TO
STAFF'S FIRST SET OF INTERROGATORIES

ITC^DELTACOM ("ITC"), by and through its undersigned counsel, hereby files and serves
Notice that it has served its Supplemental Response to the Commission Staff's First Set of
Interrogatories by hand delivery, on Jason Fudge, Esq., Florida Public Service Commission, 2540
Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and that a copy of ITC's Supplemental
Response has been provided to the parties in this docket in the manner set forth in the attached
Certificate of Service, on this 9th day of September, 2002.

Respectfully submitted,

Handwritten signature of Marsha Rule

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Proposed Issues was furnished by U. S. Mail, Hand Delivery(\*), or Facsimile (\*\*) to the following this 9<sup>th</sup> day of September, 2002:

Jason Fudge, Esq.(\*)  
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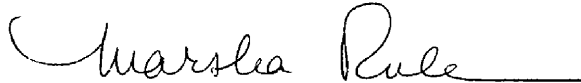
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Marsha E. Rule, Esq.

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**ITC^DELTA COM COMMUNICATION, INC.'S SUPPLEMENTAL RESPONSE TO  
STAFF'S FIRST SET OF INTERROGATORIES**

ITC^DeltaCom Communications, Inc. (ITC^DeltaCom) hereby submits its supplemental response to Interrogatory No. 2(c) of Staff's First Set of Interrogatories.

2(c) Has ITC^DeltaCom estimated what charge it would need to levy for the analogous functionality to that in BellSouth's tariff filing?

**Response:**

No. We do not have reliable estimate at this time. By "analogous" we assume that you are referring to billing SS7 on a per message basis for ISUP and TCAP messages and we would bill both terminating and originating messages just as BellSouth has proposed in its tariff. First, we fundamentally disagree that we should be billing both originating and terminating messages. We do not believe that is a sound or fair billing practice. Second, we are not currently capable of counting ISUP and TCAP messages; storing the recording/billing detail; and billing on a per message basis. Based on conversations with outside vendors, a rough estimate would be approximately \$xxxxxxxxx to upgrade our STP infrastructure (regionwide) and another \$xxxxxxxxxxxxx for hardware and software associated with modifying our billing systems and obtaining additional storage. We believe this is a conservative estimate of the cost.

*After reviewing BellSouth's cost study, it is our understanding that BellSouth paid approximately xxxxxxxxxxxxxxxxxx in capital cost for the Agilent LMS. This causes us to question the rough estimate previously provided, and we now believe that purchasing and implementing an analogous SS7 billing system could cost many times more than our previous estimate. It is unreasonable to expect small carriers like ITC^DeltaCom and US LEC to make the "defensive" purchase of such a system, particularly for a tariff that is supposed to be revenue neutral.*

Response provided by: Steve Brownworth and Billy Adkinson