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October 2, 2002

RECEIVED FPSC  
02 OCT -2 PM 4: 14  
COMMISSION  
CLERK

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

Re: Docket No. 000075-TP (Phase IIA)  
Investigation into appropriate methods to compensate carriers for exchange of traffic  
subject to Section 251 of the Telecommunications Act of 1996

Dear Ms. Bayo:

Please find enclosed an original and 15 copies of a Response to Verizon Florida, Inc.'s and Alltel Florida, Inc.'s Motion for Partial Reconsideration And, In the Alternative, Motion for Stay Pending Appeal for filing in the above matter. This Response is being filed on behalf of Frontier Communications of the South, Inc.; GTC, Inc. d/b/a GT COM; ITS Telecommunications Systems, Inc.; Northeast Florida Telephone Company d/b/a NEFCOM; Smart City Telecommunications LLC d/b/a Smart City Telecom; TDS Telecom/Quincy Telephone. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at (850) 926-9331.

Sincerely,



David B. Erwin

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM 5
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
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- SEC 1
- OTH \_\_\_\_\_

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Enclosure

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER 10643  
10643 OCT -2 02  
FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into the appropriate )  
methods to compensate carriers for ) Docket No. 000075-TP (Phase IIA)  
exchange of traffic subject to Section 251 )  
of the Telecommunications Act of 1996 ) Filed: October 2, 2002  
\_\_\_\_\_ )

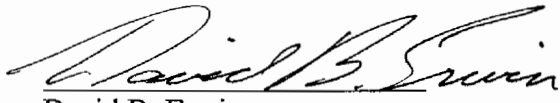
**RESPONSE TO MOTION OF VERIZON FLORIDA, INC. AND  
ALLTEL FLORIDA, INC. FOR PARTIAL RECONSIDERATION  
AND, IN THE ALTERNATIVE, MOTION FOR STAY PENDING  
APPEAL BY THE FOLLOWING SMALL LOCAL EXCHANGE  
COMPANIES: FRONTIER COMMUNICATIONS OF THE  
SOUTH, INC.; GTC, INC. D/B/A GT COM; ITS  
TELECOMMUNICATIONS SYSTEMS, INC.; NORTHEAST  
FLORIDA TELEPHONE COMPANY D/B/A NEFCOM; SMART  
CITY TELECOMMUNICATIONS LLC D/B/A SMART CITY  
TELECOM; TDS TELECOM/QUINCY TELEPHONE**

On September 25, 2002, Verizon Florida, Inc. and Alltel Florida, Inc. filed a joint motion for partial reconsideration and, in the alternative for a stay pending appeal, of Order No. PSC-02-1248-FOF-TP. The movants asked the Commission to reconsider the Commission's decision that requires the originating carrier to bear all the costs of transporting traffic to a distant point of interconnection designated by any alternative local exchange carrier (ALEC) and to reconsider the Commission's decision to adopt the originating carrier's retail local calling area as the default for determining reciprocal compensation obligations.

The following named small local exchange companies (LECs), pursuant to Rule 25-22.060(1)(b), F.A.C., hereby file this positive response in support of the motion filed by Verizon Florida, Inc. and Alltel Florida, Inc. The LECs filing this positive response are Frontier Communications of the South, Inc.; GTC, Inc. d/b/a GT COM; ITS Telecommunications Systems, Inc.; Northeast Florida Telephone Company d/b/a NEFCOM; Smart City Telecommunications LLC d/b/a Smart City Telecom; TDS Telecom/Quincy Telephone.

Each small LEC agrees that Verizon Florida, Inc. and Alltel, Inc. have identified two issues of extreme importance to the small LECs and have supplied well reasoned argument in support of their request for reconsideration.

Respectfully submitted on October 2, 2002.

By:   
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Frontier Communications of the South, Inc.  
GTC, Inc., d/b/a GT COM  
ITS Telecommunications Systems, Inc.  
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Smart City Telecommunications LLC  
d/b/a Smart City Telecom  
TDS Telecom/Quincy Telephone

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the Response to the Motion of Verizon Florida, Inc. and Alltel Florida, Inc. for Partial Reconsideration and, In the Alternative, Motion for Stay Pending Appeal in Docket No. 000075-TP (Phase IIA) were sent via U. S. Mail on October 2, 2002 to the parties on the attached list.

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