

MCWHIRTER REEVES
ATTORNEYS AT LAW

RECEIVED
NOV 23 2002

TAMPA OFFICE:
400 NORTH TAMPA STREET, SUITE 2450
TAMPA, FLORIDA 33602
P. O. BOX 3350 TAMPA, FL 33601-3350
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:

TALLAHASSEE

FPSC-COMMISSION CLERK

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX

November 25, 2002

ORIGINAL

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket No.: 020507-TP

Dear Ms. Bayo:

On behalf of the Florida Competitive Carriers Association (FCCA), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ The Florida Competitive Carriers Association's Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories (Nos. 1-32)
- ▶ The Florida Competitive Carriers Association's Objections to BellSouth Telecommunications, Inc.'s First Request for Production of Documents (Nos. 1-4)

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

MFC
 GCL
 OPC
 MMS
 SEC
 OTH

VGK/mls
Enclosures

RECEIVED & FILED

mas
FPSC BUREAU OF RECORDS

Nos. 1-4
DOCUMENT NUMBER-DATE
12966 NOV 25 02
FPSC-COMMISSION CLERK

Nos 1-32
DOCUMENT NUMBER-DATE

12965 NOV 25 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of the Florida
Competitive Carriers Association
Against BellSouth Telecommunications, Inc.
and Request for Expedited Relief

Docket No. 020507-TP

Filed: November 25, 2002

**FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S
OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S FIRST SET OF
INTERROGATORIES (NOS. 1 – 32)**

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.340, Florida Rules of Civil Procedure, the Florida Competitive Carriers Association (FCCA) files the following objections to BellSouth Telecommunications, Inc.'s (BellSouth) First Set of Interrogatories (Nos. 1-32).¹ The objections stated herein are preliminary in nature and are made at this time to comply with the 10-day requirement set forth in Order No. PSC-02-1537-PCO-TL. Should additional grounds for objection be discovered as the FCCA prepares its answers, it reserves the right to supplement, revise or modify its objections at the time it serves its responses.

General Objections

1. The FCCA objects to any interrogatory that calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time the response is first made to these interrogatories or is later determined to be applicable based on the discovery of documents, investigation or analysis. FCCA in no way intends to waive any such privilege or protection.

2. In certain circumstances, the FCCA may determine upon investigation and analysis that information responsive to certain interrogatories to which objections are not otherwise asserted are confidential and proprietary and should not be produced at all or should be produced

¹ BellSouth misnumbered the Interrogatories, resulting in 6, 7 and 8 being used twice. The FCCA has used BellSouth's numbering.

only under an appropriate confidentiality agreement and protective order. By agreeing to provide such information in response to such interrogatory, the FCCA is not waiving its right to insist upon appropriate protection of confidentiality by means of a confidentiality agreement and protective order. FCCA hereby asserts its right to require such protection of any and all documents that may qualify for protection under the Florida Rules of Civil Procedure and other applicable statutes, rules and legal principles.

3. The FCCA objects to these interrogatories and any definitions and instructions that purport to expand the FCCA's obligations under applicable law. The FCCA will comply with applicable law.

4. The FCCA objects to these interrogatories to the extent they purport to require FCCA to conduct an analysis or create information not prepared by FCCA's experts or consultants in their preparation for this case. The FCCA will comply with its obligations under the applicable rules of procedure.

5. The FCCA objects to any interrogatory that requires the identification of "all" or "each" responsive document, as it can not guarantee, even after a good faith and reasonably diligent attempt, that "all" or "each" responsive document will be identified.

6. The FCCA objects to these interrogatories to the extent they impermissibly seek information from FCCA members who are not a party to the case, on the grounds that such request is overly broad, unduly burdensome, oppressive and not permitted by the applicable rules of discovery.

7. The FCCA objects to providing information to the extent it is in the public records or in the possession of BellSouth.

8. The FCCA objects to each request that is not limited in time as overly broad, unduly burdensome and vague.

9. For each specific objection made below, the FCCA incorporates by reference all of the foregoing general objections into each of its specific objections as though pleaded therein.

Specific Objections

10. BellSouth Interrogatory No. 2 states:

Please provide a full listing of all FCCA individual member companies, including the legal name and any trade names or “doing business as” names of each individual member company.

The FCCA objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. Notwithstanding these objections, and without waiving the objections, the FCCA intends to provide certain basic information about the FCCA's membership.

11. BellSouth Interrogatory No. 3 states:

Please describe with particularity how FCCA is funded: including, but not limited to, a description of the financial contributions and percentages of contributions made by each individual FCCA member.

The FCCA objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, and not calculated to lead to the discovery of admissible evidence.

12. BellSouth Interrogatory No. 4 states:

Please list the names, titles, and business addresses of the officers, directors, and management employees of FCCA. State also whether each officer, director, and management employee is affiliated with an individual member company of FCCA; if so, provide the title and name of the individual member company.

The FCCA objects to this interrogatory as irrelevant, oppressive, harassing, and not calculated to lead to the discovery of admissible evidence. Notwithstanding these objections, and without waiving the objections, the FCCA intends to provide certain basic information about the FCCA's officers.

13. BellSouth Interrogatory No. 5 states:

Do you contend that the Florida Public Service Commission has jurisdiction over Broadband Service?

The FCCA objects to this interrogatory as irrelevant and not calculated to lead to the discovery of admissible evidence.

14. BellSouth Interrogatory No. 6 states:

If the answer to Interrogatory No. 5 is in the affirmative, please cite all statutes, rules, regulations, orders, or other legal authority that support your contention.

The FCCA has objected to Interrogatory No. 5 and objects to this interrogatory as irrelevant and not calculated to lead to the discovery of admissible evidence.

15. BellSouth Interrogatory No. 7 states:

Do you contend that the Florida Public Service Commission has jurisdiction over Cable Modem service?

The FCCA objects to this interrogatory as irrelevant and not calculated to lead to the discovery of admissible evidence.

16. BellSouth Interrogatory No. 8 states:

If the answer to Interrogatory No. 7 is in the affirmative, please cite all statutes, rules, regulations, orders, or other legal authority that support your contention.

The FCCA has objected to Interrogatory No. 7 and objects to this interrogatory as irrelevant and not calculated to lead to the discovery of admissible evidence.

17. BellSouth Interrogatory No. 6 states:

Please state whether any of FCCA's members provide Broadband Service and/or DSL service to customers in Florida.

The FCCA objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

18. BellSouth Interrogatory No. 7 states:

If the answer to Interrogatory No. 6 is in the affirmative, please:

- i. Describe with particularity the nature of the Broadband Service and/or DSL service each FCCA member is providing in Florida, including description of the protocols used (e.g., ADSL, IDSL, Cable Modem, etc.) as well as all applicable rates, terms and conditions of such services;
- ii. State the total number of customers to whom each FCCA member is providing Broadband Service and/or DSL Service in Florida, including stating the total number of residential and business customers being provided such service;
- iii. Describe with particularity the nature of the technology used to provide the Broadband Service and/or DSL service; including, but not limited to, the number of customers served by the particular technology (e.g., if xDSL based the number of customers served by IDSL, the number of customer served by ADSL, etc.);
- iv. State whether the FCCA member utilized its own broadband equipment or purchased broadband connectivity from another provider;
- v. If the FCCA purchased connectivity from another provider, state the provider from whom the connectivity was purchased and describe with particularity the nature of the broadband service each member is purchasing in Florida, including, but not limited to a description of the protocols (e.g., ADSL, IDSL, DOCSIS) used, the rates, terms and conditions of the service, the number of circuits purchased specifying the location of the circuits by central office, remote terminal, or other location, and specifying the number of potential or qualified business and residential lines available from the provider specifying the location of the potential or qualified business lines by central office, remote terminal or other location.

The FCCA has objected to Interrogatory No. 6 and objects to this interrogatory as irrelevant, vague, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory to the extent it seeks confidential proprietary business information and trade secret information. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

19. BellSouth Interrogatory No. 8 states:

If the answer to Interrogatory No. 6 is in the negative, please:

- i. Describe with particularity all reasons, whether technical, financial, or otherwise, why each FCCA member does not provide its own Broadband Service and/or DSL service to customers in Florida; and
- ii. Identify all documents referring or relating to each FCCA member's decision not to provide its own Broadband Service and/or DSL service to customers in Florida.

The FCCA has objected to Interrogatory No. 6 and objects to this interrogatory as irrelevant, vague, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory to the extent it seeks confidential proprietary business information and trade secret information. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

20. BellSouth Interrogatory No. 9 states:

Please state whether FCCA members provide Broadband Service and/or DSL service to customers in states other than Florida.

The FCCA objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

21. BellSouth Interrogatory No. 10 states:

If the answer to Interrogatory No. 9 is in the affirmative, please:

- i. Identify those states in which FCCA members provide Broadband Service and/or DSL service;
- ii. Describe with particularity the nature of the Broadband Service and/or DSL Service FCCA members are providing in each state, including a description of the protocols used (e.g., ADSL, ISDL, Cable Modem, etc.) as well as all applicable rates, terms and conditions of such service;

- iii. State the total number of customer to whom FCCA is providing Broadband Service and/or DSL service in each such state, including stating the total number of residential and business customers being provided service.

The FCCA has objected to Interrogatory No. 9 and objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory to the extent it seeks confidential proprietary business information and trade secret information. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

22. BellSouth Interrogatory No. 11 states:

If FCCA members provide Broadband Service and/or DSL service, will these members provide such service to an end user customer irrespective of whether that customer also purchases telecommunications service from the FCCA member providing the voice service (i.e., do any FCCA members provide a stand-alone Broadband Service and/or DSL service)?

The FCCA objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

23. BellSouth Interrogatory No. 12 states:

If the answer to Interrogatory No. 11 is in the affirmative, please:

- i. Describe with particularity the nature of the stand-alone Broadband Service and/or DSL service the FCCA member is providing, including identifying the states in which such service is provided and including a description of the protocols used (e.g., ADSL, IDSL, Cable Modem, etc.) as well as all applicable rates, terms, and conditions;
- ii. State the total number of customers to whom the FCCA member is providing the stand-alone Broadband Service and/or DSL service,

including stating the total number of residential and business customers being provided such service in each state; and

- iii. Identify all documents referring or relating to the stand-alone Broadband Service and/or DSL service the FCCA member is providing.

The FCCA has objected to Interrogatory No. 11 and objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory to the extent it seeks confidential proprietary business information and trade secret information. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

24. BellSouth Interrogatory No. 13 states:

If the answer to Interrogatory No. 11 is in the negative, please:

- i. Describe with particularity the reasons, whether technical, financial or otherwise, why each FCCA member does not provide its own Broadband Service and/or DSL service to customers of other voice providers in Florida;
- ii. Identify the equipment providers and/or vendors with whom you have had discussions concerning the potential purchase of equipment capable or providing DSL service;
- iii. State the date when discussions with equipment providers and/or vendors took place;
- iv. Describe with particularity the nature of any such discussion and/or agreement; including, but not limited to applicable rates, price quotes, terms, and conditions for the purchase or equipment capable of providing DSL services;
- v. Identify all documents referring or relating to each FCCA members' decision not to provide its own Broadband Service and/or DSL service to customers of other voice providers in Florida as well as all documents referring to discussions between you and equipment vendors and/or providers.

The FCCA has objected to Interrogatory No. 11 and objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory to the extent it seeks confidential proprietary business information and trade secret information. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

25. BellSouth Interrogatory No. 14 states:

Identify each market in which any FCCA member is providing DSL service and state the number of customers in each such market to whom the service is being provided, including stating the total number of residential and business customers being provided such service.

The FCCA objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory to the extent it seeks confidential proprietary business information and trade secret information. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

26. BellSouth Interrogatory No. 15 states:

Describe with particularity each FCCA member's DSL network; including, but not limited to, identifying the location of that network and describing the specific equipment that comprises that network, identifying the vendor and/or provider of the DSL equipment, the number, manufacturer, and size of DSLAMs installed in that network by central office, remote terminal or other location, as well as the total number of collocation sites in which the FCCA member has collocated its facilities with facilities of BellSouth.

The FCCA objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory to the extent it seeks confidential proprietary business information

and trade secret information. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

27. BellSouth Interrogatory No. 16 states:

Has any FCCA member at any time entered into any agreement or held any discussions with any Cable Modem service provider regarding a joint offering or package of services involving the FCCA member's voice service and the Cable Modem service provider's Broadband Service.

The FCCA objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory to the extent it seeks confidential proprietary business information and trade secret information. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

28. BellSouth Interrogatory No. 17 states:

If the answer to Interrogatory No. 16 is in the affirmative, please:

- i. Identify the Cable Modem service provider with whom you have had such an agreement or discussions;
- ii. State the date when such an agreement was executed or such discussions took place;
- iii. Describe with particularity the nature of such an agreement or discussion, including applicable rates, terms and conditions for a joint offering or package of services involving the FCCA member's voice service and the Cable Modem service provider's Broadband Service; and
- iv. Identify all documents referring or relating to such an agreement or discussion.

The FCCA has objected to Interrogatory No. 17 and objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory to the extent it seeks confidential proprietary business information and trade secret information. The FCCA objects to

this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

29. BellSouth Interrogatory No. 18 states:

If the answer to Interrogatory No. 16 is in the negative, please describe with particularity all reasons, whether technical, financial, or otherwise, why the FCCA member has decided not to enter into an agreement or discussions with a Cable Modem service provider concerning a joint offering or package of services involving the FCCA member's voice service and the Cable Modem service provider's Broadband Service.

The FCCA has objected to Interrogatory No. 16 and objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory to the extent it seeks confidential proprietary business information and trade secret information. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

30. BellSouth Interrogatory No. 19 states:

Has any FCCA member at any time entered into an agreement or held any discussions with any DSL service provider and/or wholesale DSL network provider regarding (a) a joint offering or package of service involving the FCCA member's voice service and the DSL service provider's Broadband Service, including, but not limited to, engaging in line splitting; and/or (b) purchasing a wholesale broadband package for the purpose of creating a retail broadband service offering?

The FCCA objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory to the extent it seeks confidential proprietary business information and trade secret information. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

31. BellSouth Interrogatory No. 20 states:

If the answer to Interrogatory No. 19 is in the affirmative, please:

- i. Identify the DSL service provider with whom the FCCA member has had such an agreement or discussion;
- ii. State the date when such an agreement was executed or such discussions took place;
- iii. Describe with particularity the nature of such an agreement or discussions, including applicable rates, terms, and conditions for (a) a joint offering or package of services involving the FCCA member's voice service and the DSL service provider's Broadband Service and/or (b) a wholesale offering or wholesale broadband package; and
- iv. Identify all documents referring or relating to such an agreement or discussion.

The FCCA has objected to Interrogatory No. 19 and objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory to the extent it seeks confidential proprietary business information and trade secret information. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

32. BellSouth Interrogatory No. 21 states:

If the answer to Interrogatory No. 19 is in the negative, please describe with particularity all reasons, whether technical, financial, or otherwise, why (a) any FCCA member has not entered into an agreement or discussions with any DSL service provider concerning a joint offering or package of services involving the FCCA member's voice service and the DSL service provider's Broadband Service, including, but not limited to, engaging in line splitting and/or (b) any FCCA member has not entered into an agreement or discussions with any wholesale DSL service provider.

The FCCA has objected to Interrogatory No. 19 and objects to this interrogatory as irrelevant, vague, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence. The FCCA objects to this interrogatory to the extent it seeks

confidential proprietary business information and trade secret information. The FCCA objects to this interrogatory as an impermissible attempt to seek discovery from entities who are not parties to this case.

33. BellSouth Interrogatory No. 22 states:

If you currently provide Broadband Service, do you have any objection to the Public Service Commission in those states in which you provide such service from requiring you to provide Broadband Service to an end user customer irrespective of whether that customer also purchases telecommunications service from you (i.e., requiring you to provide a stand-alone Broadband Service)? If the answer to the foregoing Interrogatory is in the affirmative, describe with particularity all such objections.

The FCCA objects to this interrogatory as irrelevant, overbroad, oppressive, harassing, unduly burdensome and not calculated to lead to the discovery of admissible evidence.

34. BellSouth Interrogatory No. 23 states:

If you currently provide DSL Service, do you have any objections to the Public Service Commission in those states in which you provide such service from requiring you to provide DSL Service over the unbundled loops purchased by any and all other ALECs operating in those states? If the answer to the foregoing Interrogatory is in the affirmative, describe with particularity all such objections.

The FCCA objects to this interrogatory as irrelevant, overbroad, vague and not calculated to lead to the discovery of admissible evidence.

35. BellSouth Interrogatory No. 24 states:

Do you have any objection to BellSouth, or any ALEC, utilizing free of charge the high frequency portion of unbundled loops purchased by you to (a) provision DSL Service to your end user customers; and (b) access the unbundled loop to perform testing, repair, maintenance, and/or troubleshooting? If the answer to the foregoing Interrogatory is in the affirmative, describe with particularity all such objections.

The FCCA objects to this interrogatory as irrelevant, overbroad, vague and not calculated to lead to the discovery of admissible evidence.

36. BellSouth Interrogatory No. 25 states:

Do you have any objection to BellSouth, or any ALEC, taking whatever steps are necessary in order to provision its DSL Service over unbundled loops purchased by you to provision DSL Service to your end user customers? If the answer to the foregoing Interrogatory is in the affirmative, describe with particularity all such objections.

The FCCA objects to this interrogatory as irrelevant, overbroad, vague and not calculated to lead to the discovery of admissible evidence.

37. BellSouth Interrogatory No. 26 states:

What rates, terms and conditions, if any, do you contend should apply when BellSouth, or any ALEC, uses the high-frequency portion of an unbundled loop purchased by you to provide DSL Service to your end user customers?

The FCCA objects to this interrogatory as irrelevant and not calculated to lead to the discovery of admissible evidence.

38. BellSouth Interrogatory No. 27 states:

If BellSouth, or any ALEC, were to use the high frequency portion of an unbundled loop purchased by you for the purpose of providing DSL Service, would you request compensation for such use of the high frequency portion of that loop?

The FCCA objects to this interrogatory as irrelevant and not calculated to lead to the discovery of admissible evidence.

39. BellSouth Interrogatory No. 28 states:

If the answer to Interrogatory No. 32 is in the affirmative, state the amount of compensation you would charge and describe with particularity how this charge was calculated.

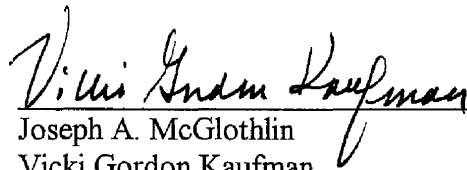
The FCCA objects to this interrogatory as vague and unintelligible. Interrogatory No. 32 does not reference a charge or compensation.

40. BellSouth Interrogatory No. 29 states:

Do you contend that any state or federal laws, rules, or regulations are violated when BellSouth does not provide FastAccess service to carriers that offer DSL service (as contrasted to carriers that do NOT offer DSL service)? If the answer

to the foregoing Interrogatory is in the affirmative, state all facts and identify all documents that support this contention.

The FCCA objects to this interrogatory as vague and unintelligible. It is the FCCA's understanding that FastAccess is offered to retail customers.



Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman & Arnold, PA
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 Telephone
(850) 222-5606 Telefax

Attorneys for the Florida Competitive
Carriers Association

CERTIFICATE OF SERVICE

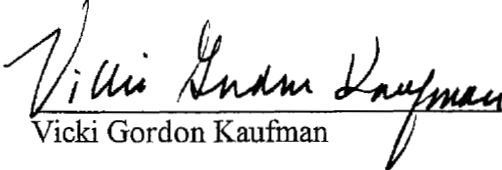
I HEREBY CERTIFY that a true and correct copy of the foregoing Florida Competitive Carriers Association's Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories (Nos. 1-35) has been furnished by (*) hand delivery, (**) electronic mail or U.S. Mail this 25th day of November, 2002, to the following:

(*) (**) Patricia Christensen
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

(*) (**) Nancy White
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301-1556

(**) Floyd R. Self
215 South Monroe Street, Suite 701
Tallahassee, Florida 32301

(**) Nanette Edwards
Director-Regulatory
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802


Vicki Gordon Kaufman