

WOMBLE  
CARLYLE  
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April 28, 2003

VIA FEDERAL EXPRESS

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

Re: Complaint of AT&T Communications of the Southern  
States, LLC, Teleport Communications Group, Inc., and  
TCG South Florida For Enforcement of Interconnection  
Agreements with BellSouth Telecommunications, Inc.  
Docket No. 020919-TP

Dear Mrs. Bayo:

Today, AT&T Communications of the Southern States, LLC, Teleport  
Communications Group, Inc., and TCG South Florida (collectively "AT&T")  
served its Responses to Staff's First Set of Interrogatories and Request for  
Production of Documents in the above referenced docket.

A copy of the cover letter is enclosed. Please stamp two (2) copies of  
this cover letter in the usual manner and return to us via the enclosed  
envelope.

If you have any questions, please do not hesitate to contact me at  
404-888-7437.

Sincerely yours,

Loretta A. Cecil

Enclosure(s)

DOCUMENT NUMBER-DATE

03858 APR 28 8

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

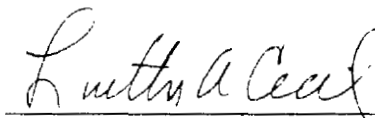
I HEREBY CERTIFY that a copy of the foregoing cover letter was served via Hand Delivery (\*), electronic mail and First Class U.S. Mail. This the 28<sup>rd</sup> of April 2003.

BellSouth Telecommunications, Inc.  
Nancy B. White/James Meza III/Andrew Shore\*  
c/o Ms. Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556  
Phone: (850) 224-7798  
Fax: (850) 222-8640  
Email: [nancy.sims@bellsouth.com](mailto:nancy.sims@bellsouth.com)/[andrew.shore@bellsouth.com](mailto:andrew.shore@bellsouth.com)

Florida Cable Telecommunications Assoc., Inc.  
Michael A. Gross  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303  
Phone: 850-681-1990  
Fax: (850) 681-9676  
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Patricia Christensen, Esq.  
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Room 370  
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2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Fax: (850) 413-6221  
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David Eppsteiner, Esq.  
AT&T Communications of the Southern States LLC  
Suite 8100  
1200 Peachtree Street, NE  
Atlanta, GA 30309



Loretta A. Cecil, Esq.

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April 28, 2003

VIA FEDERAL EXPRESS

Ms. Patricia Christensen, Esq.  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Complaint of AT&T Communications of the Southern  
States, LLC, Teleport Communications Group, Inc., and  
TCG South Florida For Enforcement of Interconnection  
Agreements with BellSouth Telecommunications, Inc.  
Docket No. 020919-TP

Dear Ms. Christensen:

Enclosed are AT&T Communications of the Southern States, LLC,  
Teleport Communications Group, Inc., and TCG South Florida (collectively  
"AT&T") Responses to Staff's First Set of Interrogatories and Request for  
Production of Documents in the above referenced docket.

If you have any questions, please do not hesitate to contact me at  
404-888-7437.

Sincerely yours,

Loretta A. Cecil

Enclosure(s)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of AT&T Communications of the Southern States, LLC, Teleport Communications Group, Inc., and TCG South Florida (collectively "AT&T") Response to BellSouth's First Set of Interrogatories and Request for Production of Document was served via Hand Delivery (\*), electronic mail and First Class U.S. Mail. This the 28th of April 2003.

BellSouth Telecommunications, Inc.  
Nancy B. White/James Meza III/Andrew Shore\*  
c/o Ms. Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556  
Phone: (850) 224-7798  
Fax: (850) 222-8640  
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David Eppsteiner, Esq.  
AT&T Communications of the Southern States LLC  
Suite 8100  
1200 Peachtree Street, NE  
Atlanta, GA 30309

  
Loretta A. Cecil, Esq.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In Re: Request for Arbitration ) DOCKET NO. 020919-TP**  
**Concerning Complaint of AT&T )**  
**Communications of the Southern )**  
**States, LLC, Teleport )**  
**Communications Group, Inc., and )**  
**TCG South Florida for )**  
**Enforcement of Interconnection )**  
**Agreements with BellSouth )**  
**Telecommunications, Inc. )**

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC RESPONSE**  
**TO STAFF'S FIRST SET OF INTERROGATORIES (1, 2) AND FIRST**  
**REQUEST FOR PRODUCTION OF DOCUMENTS (1, 2)**

Pursuant to Rule 28-106.206, Florida Administrative Code, Rules 1.340 and 1.280, and the Florida Rules of Civil Procedure, AT&T Communications of the Southern States, LLC, Teleport Communications Group, Inc., and TCG South Florida (collectively "AT&T") hereby files the following Responses to Staff's First Set of Interrogatories and First Request for Production of Documents dated April 8, 2003.

Respectfully submitted this 28th day of April, 2003.

By: 

Loretta A. Cecil, Esq.

FL Bar No. 358983

Womble Carlyle Sandridge & Rice, PLLC

Suite 3500

1201 West Peachtree Street

Atlanta, GA 30309

Attorney for AT&T Communications of the  
Southern States, LLC, Teleport

Communications Group, Inc. and TCG  
South Florida