

ORIGINAL

Legal Department

J. Phillip Carver
Senior Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0710

RECEIVED-FPSC
OCT - 6 PM 4:43
COMMISSION
CLERK

October 6, 2003

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc.'s served its Responses and Objections to Covad's Second Request for Production of Documents (No. 2), dated September 15, 2003.

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,

J. Phillip Carver
J. Phillip Carver (1/15)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC _____
OTH _____

RECEIVED & FILED
R. V. N
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
09673 OCT-6 8
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 981834-TP and 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express (*), First Class U.S. Mail and Electronic Mail this 6th day of October, 2003 to the following:

Beth Keating, Staff Counsel
Adam Teitzman, Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6212
Fax. No. (850) 413-6250
bkeating@psc.state.fl.us
ateitzma@psc.state.fl.us

FPSC Staff By E-Mail Only:
amaurey@psc.state.fl.us
bgardner@psc.state.fl.us
bcasey@psc.state.fl.us
cbulecza@psc.state.fl.us
david.dowds@psc.state.fl.us
jrojas@psc.state.fl.us
jschindl@psc.state.fl.us
jebrown@psc.state.fl.us
lking@psc.state.fl.us
mbrinkle@psc.state.fl.us
plee@psc.state.fl.us
pvickery@psc.state.fl.us
plester@psc.state.fl.us
sasimmon@psc.state.fl.us
sbbrown@psc.state.fl.us
scater@psc.state.fl.us
tbrown@psc.state.fl.us
vmckay@psc.state.fl.us
zring@psc.state.fl.us

Joseph A. McGlothlin
Vicki Gordon Kaufman (+)
Timothy Perry
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold,
& Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Attys. for FCCA
Attys. for Network Telephone Corp.
Attys. for BlueStar
Attys. For Covad (+)
jmcglothlin@mac-law.com
vkaufman@mac-law.com
tperry@mac-law.com

Richard A. Chapkis (+)
Terry Scobie
Verizon Florida, Inc.
One Tampa City Center
201 North Franklin Street (33602)
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110
Tel. No. (813) 483-2606
Fax. No. (813) 204-8870
Richard.chapkis@verizon.com
terry.scobie@verizon.com

Paul Turner
Supra Telecommunications & Info.
Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 476-4247
Fax. No. (305) 476-4282
pturner@stis.com

Susan S. Masterton (+)
Sprint Comm. Co. LLP
1313 Blair Stone Road (32301)
P.O. Box 2214
MC: FLTLHO0107
Tallahassee, FL 32316-2214
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777
Susan.masterton@mail.sprint.com

Sprint-Florida, Incorporated
Mr. F. B. (Ben) Poag
P.O. Box 2214 (MC FLTLHO0107)
Tallahassee, FL 32316-2214
Tel. No. (850) 599-1027
Fax. No. (407)814-5700
Ben.Poag@mail.sprint.com

William H. Weber, Senior Counsel
Gene Watkins (*)
Covad Communications
1230 Peachtree Street, N.E.
19th Floor
Atlanta, Georgia 30309
Tel. No. (404) 942-3494
Fax. No. (404) 942-3495
wweber@covad.com
gwatkins@covad.com

Rodney L. Joyce
Shook, Hardy & Bacon, L.L.P.
600 14th Street, N.W.
Suite 800
Washington, D.C. 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
Counsel for Network Access Solutions
rjoyce@shb.com

Verizon Florida, Inc.
Ms. Michelle A. Robinson
%Mr. David Christian
106 East College Avenue
Suite 810
Tallahassee, FL 32301-7704
Tel. No. (813) 483-2526
Fax. No. (813) 223-4888
Michelle.Robinson@verizon.com
David.Christian@verizon.com

Ms. Lisa A. Riley
Virginia C. Tate
1200 Peachtree Street, N.E.
Suite 8066
Atlanta, GA 30309-3523
Tel. No. (404) 810-7812
Fax. No. (404) 877-7646
lriley@att.com
vtate@att.com

Florida Digital Network, Inc.
Matthew Feil, Esq.
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
Tel. No. (407) 835-0460
Fax. No. (407) 835-0309
mfeil@floridadigital.net

Catherine K. Ronis, Esq.
Daniel McCuaig, Esq. (+)
Jonathan J. Frankel, Esq.
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, DC 20037-1420
Tel. No. (202) 663-6000
Fax. No. (202) 663-6363
catherine.ronis@wilmer.com
daniel.mccuaig@wilmer.com

Jonathan Audu
c/o Ann Shelfer
Supra Telecommunications and
Information Systems, Inc.
1311 Executive Center Drive
Koger Center - Ellis Building
Suite 200
Tallahassee, FL 32301-5027
Tel. No. (850) 402-0510
Fax. No. (850) 402-0522
ashelfer@stis.com
jonathan.audu@stis.com

Mickey Henry
AT&T
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, Georgia 30309-3523
Tel. No. (404) 810-2078
michaeljhenry@att.com

Mellony Michaux (by e-mail only)
AT&T
mmichaux@att.com

Roger Fredrickson (by e-mail only)
AT&T
rfrederickson@att.com

Tracy W. Hatch, Esq. (+)
AT&T Communications of the
Southern States, LLC
101 North Monroe Street, Ste. 700
Tallahassee, FL 32301
Tel. No. (850) 425-6360
Fax No. (850) 425-6361
thatch@att.com

Floyd Self
Messer, Caparello & Self
Post Office Drawer 1876
215 South Monroe Street, Suite 701
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Co-counsel for AT&T
fself@lawfla.com

Scott A. Kassman
FDN Communications
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
Tel No. (407) 447-6636
Fax No. (407) 447-4839
www.fdn.com



J. Phillip Carver (CA)

(+) Signed Protective Agreement