

ORIGINAL

**MCWHIRTER REEVES**  
ATTORNEYS AT LAW

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

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

October 16, 2003

**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.: 030851-TP

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ DIECA Communications, Inc., d/b/a Covad Communications Company's Objections to BellSouth Telecommunications, Inc.'s First Requests for Production of Documents (Nos. 1 - 21) and First Set of Interrogatories (Nos. 1 - 84).

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

RECEIVED & FILED  
16  
FPSC-BUREAU OF RECORDS

RECEIVED-PPSC  
OCT 16 PM 4:07  
COMMISSION  
CLERK

AUS	_____
CAF	_____
CMF	_____
CCM	_____ VGK/bae
CTR	_____ Enclosure
ECR	_____
GCL	_____
GPC	_____
GMS	_____
SEC	_____
STP	_____

DOCUMENT # 030851-TP  
9 21 130 6 4 1 0 1  
FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising  
From Federal Communications Commission  
Triennial UNE review: Local Circuit Switching  
For Mass Market Customers

Docket No. 030851-TP  
Filed: October 16, 2003

---

**DIECA COMMUNICATIONS, INC., D/B/A COVAD COMMUNICATIONS  
COMPANY'S OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S  
FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS (NOS. 1 – 21) AND  
FIRST SET OF INTERROGATORIES (NOS. 1 – 84)**

DIECA Communications, Inc., d/b/a Covad Communications Company (Covad), pursuant to Rule 28.106-206, Florida Administrative Code, and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following General and Specific Objections to BellSouth Telecommunications, Inc.'s First Requests for Production of Documents (Nos. 1 – 21) and First Set of Interrogatories (Nos. 1 – 84), dated October 9, 2003.

**GENERAL OBJECTIONS**

1. Covad objects to the interrogatories and requests for production to the extent they seek to impose an obligation on Covad to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such interrogatories and requests for production are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Specifically, BellSouth defines Covad to include, in relevant part, "parents, subsidiaries, and affiliates. . . ." Covad will not be responding to discovery that seeks information from parent and affiliate companies.

2. Covad objects to the interrogatories and requests for production to the extent they are intended to apply to matters other than those subject to the jurisdiction of the Commission. BellSouth objections to such interrogatories and requests for production as being irrelevant,

overly broad, unduly burdensome, and oppressive.

3. Covad objects to each and every interrogatory and request for production and instruction to the extent that such request or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. Covad objects to each and every interrogatory and request for production insofar as the interrogatories and requests are vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories and requests for production. Any answers provided by Covad in response to the interrogatories and requests for production will be provided subject to, and without waiver, of the foregoing objection.

5. Covad objects to each and every interrogatory and request for production insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Covad will attempt to note in its responses each instance where this objection applies.

6. Covad objects to providing information to the extent that such information is already in the public record before the Commission.

7. Covad objects to BellSouth's discovery requests, instructions and definitions, insofar as they seek to impose obligations on Covad that exceed the requirements of the Florida Rules of Civil Procedure and Florida Law.

8. Covad objects to each and every interrogatory and request for production, insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. Covad is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Covad creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. Covad will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the requests purport to require more, Covad objects on the grounds that compliance would impose an undue burden or expense.

10. Covad objects to each and every interrogatory and request for production to the extent that the information requested constitutes "trade secrets" pursuant to Section 90.506, Florida Statutes. To the extent that BellSouth requests proprietary confidential business information, Covad will make such information available in accordance with a protective agreement, subject to other general or specific objections contained herein.

11. Covad objects to any discovery request that seeks to obtain "all" or particular documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by Covad in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

#### **SPECIFIC OBJECTIONS TO INTERROGATORIES**

##### **INTERROGATORIES 1, 2, 5-7 and 18 [Regarding Covad Owned Switches]**

1. Identify each switch owned by Covad that Covad uses to provide a qualifying service anywhere in Florida, irrespective of whether the switch itself is located in the State and

regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

2. For each switch identified in response to Interrogatory No. 1, please:
  - a) Provide the Common Language Location Identifier ("CLLI") code of the switch;
  - b) provide the street address, including the city and state in which the switch is located;
  - c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
  - d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
  - e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
  - f) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.
5. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Florida utilizing any of the switches identified in response to Interrogatory No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.
6. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of

voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory 1.

7. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 6, separate the lines by end user and end user location in the following manner:

- a) The number of end user customers to whom you provide one (1) voicegrade equivalent line;
- b) The number of end user customers to whom you provide two (2) voicegrade equivalent lines;
- c) The number of end user customers to whom you provide three (3) voicegrade equivalent lines;
- d) The number of end user customers to whom you provide four (4) voicegrade equivalent lines;
- e) The number of end user customers to whom you provide five (5) voicegrade equivalent lines;
- f) The number of end user customers to whom you provide six (6) voicegrade equivalent lines;
- g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- h) The number of end user customers to whom you provide eight (8) voicegrade equivalent lines;
- i) The number of end user customers to whom you provide nine (9) voicegrade equivalent lines;

- j) The number of end user customers to whom you provide ten (10) voicegrade equivalent lines;
- k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

18. Do you have switches that are technically capable of providing, but are not presently being used to provide, a qualifying service in Florida? If the answer to this Interrogatory is in the affirmative, please:

- a) provide the Common Language Location Identifier ("CLLI") code of the switch;
- b) provide the street address, including the city and state in which the switch is located;
- c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- f) identify any documents in your possession, custody or control that discuss, evaluate, analyze or otherwise refer or relate to whether those switches could be used to provide a qualifying service in Florida.

## SPECIFIC OBJECTIONS TO INTERROGATORIES 1, 2, 5-7 and 18

Because Covad does not provide voice services over its ATM switches and because ATM switches are not circuit switches, discovery related to Covad's ATM switches is irrelevant to both the "triggers" and "potential deployment" analyses in this docket. The Federal Communications Commission ("FCC") states in its Triennial Review Order ("TRO") that "[f]or purposes of the examination described here, mass market customers are *analog voice customers* . . ." TRO ¶ 497 (emphasis added). In the "triggers" analysis, the FCC repeatedly states that the switches to be considered are *only* those "*actively providing voice service* used to serve the mass market." TRO ¶ 499 (emphasis added); see also, ¶ 498 ("triggers identify *existing* examples of multiple competitive LECs using their own switches to serve mass market [*analog voice*] customers . . .") (emphasis added); ¶ 499 ("the identified competitive switch providers should be *actively providing voice service* to mass market customers . . .") (emphasis added); ¶ 500 ("we find that states shall not evaluate any other factors . . . . The key consideration to be examined by state commissions is whether the providers are *currently* offering and able to provide [*analog voice*] service . . .") (emphasis added).

Similarly, in the "potential deployment" analysis, the FCC states that "States should first examine whether competitors are already using their own switches *to serve voice customers* . . ." and whether there "are two wholesale providers or three self-provisioners of switching *servicing the voice enterprise market* . . ." TRO ¶ 508 (emphasis added); see also ¶ 507. Covad does not provide a single voice service – to mass markets or enterprise markets – over its ATM switches. While ATM switches may have the potential to support certain kinds of voice over internet protocol (VoIP) services, such nascent technologies are not currently available to serve mass markets. Accordingly, discovery regarding Covad's ATM switches is irrelevant in this docket.



Moreover, the FCC's consideration of circuit switches is wholly separate from the FCC's analysis of ATM switching. Indeed, the FCC's holdings regarding these two kinds of switches are diametrically opposed: circuit switches serving the mass *voice* market are unbundled while ATM switches serving the mass *data* market are not. Compare ¶¶ 459-485 with ¶¶ 535-541 (noting that ATM switches are ubiquitous and "are much cheaper to deploy than circuit switches." ¶ 538). Clearly then, ATM switches and circuit switches are not interchangeable. As such, the discovery served on Covad seeking information about Covad's ATM switches is not reasonably calculated to lead to admissible evidence and is, consequently, irrelevant.

Covad will, subject to and without waiving the foregoing objections, provide the make, model, number, location and total customers served in Florida for Covad's ATM switches in response to the above-referenced discovery.

**INTERROGATORIES 15-17 and 19-49 [Regarding Covad's xDSL Business, Business Plans, and Statistics]**

15. Identify every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service using: (1) the Unbundled Network Element Platform (UNE-P), (2) self-provisioned switching, (3) switching obtained from a third party provider other than an ILEC, or (4) any combination of these items.
16. Identify any documents that you have provided to any of your employees or agents, or to any financial analyst, bank or other financial institution, shareholder or any other person that describes, presents, evaluates or otherwise discusses in whole or part, how you intend to offer or provide local exchange service, including but not limited to such things as the markets in which you either do participate or intend to participate, the costs of providing such service,

the market share you anticipate obtaining in each market, the time horizon over which you anticipate obtaining such market share, and the average revenues you expect per customer.

17. If not identified in response to a prior Interrogatory, identify every document in your possession, custody, or control referring or relating to the financial viability of self-provisioning switching in your providing qualifying services to end user customers.
19. Identify each MSA in Florida where you are currently offering a qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.
20. If you offer a qualifying service outside of the MSAs identified in response to Interrogatory 19, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.
21. Describe with particularity the qualifying services that you offer in the geographic areas described in response to Interrogatories 19 and 20, including the rates, terms, and conditions under which such services are offered. If the qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

22. Identify each MSA in Florida where you are currently offering a non-qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.
23. If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.
24. Describe with particularity the non-qualifying services that you offer in the geographic areas described in response to Interrogatories 22 and 23, including the rates, terms, and conditions under which such services are offered. If the nonqualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.
25. Please state the total number of end users customers in the State of Florida to whom you only provide qualifying service.

26. For those end user customers to whom you only provide qualifying service in the State of Florida, please state the average in monthly revenues you receive from each such end user customer.
27. For those end user customers to whom you only provide qualifying service in the State of Florida, please state the average number of lines that you provide each such end-user customer.
28. Please state the total number of end users customers in the State of Florida to whom you only provide non-qualifying service.
29. For those end user customers to whom you only provide non-qualifying service in the State of Florida, please state the average monthly revenues you receive from each such end user customer.
30. Please state the total number of end users customers in the State of Florida to whom you provide both qualifying and non-qualifying service.
31. For those end user customers to whom you provide qualifying and non-qualifying service in the State of Florida, please state the average monthly revenues you receive from each such end user customer.
32. For those end user customers to whom you provide qualifying and non-qualifying service in the State of Florida, please state the average number of lines that you provide each such end user customer.
33. Please provide a breakdown of the total number of end user customers served by Covad in Florida by class or type of end user customers (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers. For each such classification, and/or if you provide

another type of classification, define and describe with specificity the classification so that it can be determined what kinds of customers you have in each classification).

34. For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.
35. For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical chum rate for each such end user class or type. Please provide this information for each month from January 2000 to the present.
36. For each class or type of end user customer referenced in Interrogatory No. 33, please state the share of the local exchange market you have obtained. Please provide this information for each month from January 2000 to the present.
37. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in Florida.
38. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in Florida.
39. Describe how the marketing organization that is responsible for marketing qualifying service in Florida is organized, including the organization's structure, size in terms of full time or equivalent employees including contract and temporary employees, and the physical work locations for such employees. In answering this Interrogatory, please state whether you utilize authorized sales representatives in your marketing efforts in Florida, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

40. How do you determine whether you will serve an individual customer's location with multiple DS0s or whether you are going to use a DS1 or larger transmission system? Provide a detailed description of the analysis you would undertake to resolve this issue, and identify the factors that you would consider in making this type of a decision.
41. Is there a typical or average number of DS0s at which you would chose to serve a particular customer with a DS1 or larger transmission system, all other things being equal? If so, please provide that typical or average number and explain how this number was derived.
42. What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on network side of the demarcation point) to provide service to a customer with a DS1 rather than multiple DS0s? For instance, if a customer had 10 DS0s, and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, or a digital PBX be required in order to provide equivalent service to the end user that has 10 DS0s? If so, please provide the average cost of the equipment that would be required to provide that functional equivalency (that is, the channel bank, or the PBX or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DS0s.)
43. What cost of capital do you use in evaluating whether to offer a qualifying service in a particular geographic market and how is that cost of capital determined?
44. With regard to the cost of capital you use in evaluating whether to provide a qualifying service in a particular geographic market, what are the individual components of that cost of capital, such as the debt-equity ratio, the cost of debt and the cost of equity?

45. In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one year, five years, ten years or some other time horizon over which you evaluate the project?
46. Provide your definition of sales expense as that term is used in your business.
47. Based on the definition of sales expense in the foregoing Interrogatory, please state how you estimate sales expense when evaluating whether to offer a qualifying service in a particular geographic market?
48. Provide your definition of general and administrative (G&A) costs as you use those terms in your business.
49. Based on the definition of G&A costs in the foregoing Interrogatory, please state how you estimate G&A expenses when evaluating whether to offer a qualifying service in a particular geographic market?

**SPECIFIC OBJECTIONS TO INTERROGATORIES 15-17 and 19-49 [Regarding Covad's DSL Business, Business Plans, and Statistics]**

Interrogatories 15-17 and 19-49 are a “cut and paste” set of interrogatories designed for and served on Florida competitive voice providers. Not surprisingly, a great deal of BellSouth’s “cut and paste” voice discovery is both overly broad and irrelevant as to Covad – a DSL company. Because Covad solely provides high speed internet access, its churn, customer counts, business models, marketing, geographic markets, revenues, customer classifications, customer acquisition costs, cost of capital, expected customer growth and similar requested information is not probative of such statistics for voice providers. The “potential deployment” portion of this docket addresses the potential use of self-provisioned or wholesale switches to serve the mass *voice* market – not the mass DSL market. In the TRO, the FCC separately addressed that market. TRO ¶¶ 537-541.

While Covad has asserted that economic and operational impairment related to the lack of line splitting under UNE-L should be considered in this docket, those issues are not the subject of BellSouth's discovery. The economic impairment problems raised by Covad are associated with attempting to compete for customers in an environment where most telecommunications services are sold as part of a bundle of such services, not a general business model for UNE-L or DSL. Accordingly, Covad objects to Interrogatories 15-17 and 19-49 as irrelevant. Covad further objects that, if such discovery is relevant, it is overly broad and unduly burdensome. Nevertheless, without waiving the preceding objections, Covad will provide general churn, customer counts, business plans, and general business statistics for the state of Florida.

#### **SPECIFIC OBJECTIONS TO REQUESTS FOR PRODUCTION**

##### **REQUESTS FOR PRODUCTION 1-16 [Regarding Covad's xDSL Business, Business Plans, and Statistics]**

1. Produce all documents identified in response to BellSouth's First Set of Interrogatories.
2. Produce every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service in the State of Florida.
3. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Florida to whom you only provide qualifying service.
4. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Florida to whom you only provide qualifying service.
5. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Florida to whom you only provide non-qualifying service.



6. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Florida to whom you provide both qualifying and non-qualifying service.
7. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Florida to whom you provide both qualifying and non-qualifying service.
8. Provide all documents referring or relating to the classifications used by Covad to offer service to end user customers Florida (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).
9. Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by Covad, as requested in BellSouth's First Set of Interrogatories, No. 34.
10. Produce all documents referring or relating to the typical churn for each class or type of end user customer served by Covad, as requested in BellSouth's First Set of Interrogatories, No. 35.
11. Produce all documents referring or relating to how Covad determines whether to serve an individual customer's location with multiple DS0s or with a DS1 or larger transmission system.
12. Produce all documents referring or relating to the typical or average number of DS0s at which Covad would choose to serve a particular customer with a DS1 or larger transmission system as opposed to multiple DS0, all other things being equal.

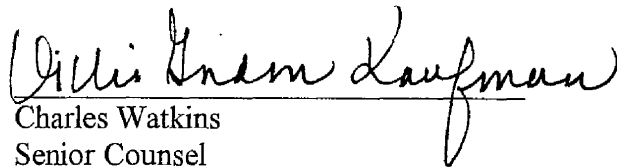
13. Produce all documents referring or relating to the cost of capital used by Covad in evaluating whether to offer a qualifying service in a particular geographic market.
14. Produce all documents referring or relating to the time period used by Covad in evaluating whether to offering a qualifying service in a particular geographic market (e.g., one year, five years, ten years or some other time horizon over which a project is evaluated).
15. Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.
16. Produce all documents referring or relating to your estimates of general and administrative (G&A) expenses when evaluating whether to offer a qualifying service in a particular geographic market.

**SPECIFIC OBJECTIONS TO REQUESTS FOR PRODUCTION 1-16 [Regarding Covad's xDSL Business, Business Plans, and Statistics]**

Like BellSouth's Interrogatories, Requests for Production numbers 1-16 are a "cut and paste" set of document requests designed for and served on Florida competitive voice providers. As such, they are both overly broad and irrelevant as to Covad – a DSL company. Because Covad solely provides high speed internet access, documents related to its business plans, monthly revenues, customer counts, customer classifications, customer acquisition costs, churn, business planning considerations, and similar requested information is not probative of such statistics for voice providers. The "potential deployment" portion of this docket addresses the potential use of self-provisioned or wholesale switches to serve the mass *voice* market – not the mass DSL market. In the TRO, the FCC separately addressed that market. TRO ¶¶ 537-541.

While Covad has asserted that economic and operational impairment related the lack of line splitting under UNE-L should be considered in this docket, those issues are not the subject of BellSouth's discovery. The economic impairment problems raised by Covad are associated

with attempting to compete for customers in an environment where most telecommunications services are sold as part of a bundle of such services, not a general business model for UNE-L or DSL. Accordingly, Covad objects to Requests for Production numbers 1-16 as irrelevant. Covad further objects that, if such discovery is relevant, it is overly broad and unduly burdensome. Nevertheless, without waiving the preceding objections, Covad will provide general churn, customer counts, business plans, and general business statistics for the state of Florida.



Charles Watkins  
Senior Counsel  
Covad Communications Co.  
1230 Peachtree Street, N.E., 19<sup>th</sup> Floor  
Atlanta, Georgia 30309  
(404) 942-3494  
(404) 942-3495 (fax)  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin, Davidson,  
Kaufman & Arnold, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
(850) 222-2525  
(850) 222-5606 (fax)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

Attorneys for DIECA Communications, Inc.  
d/b/a Covad Communications, Company

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing -DIECA Communications, Inc., d/b/a Covad Communications Company's Objections to BellSouth Telecommunications, Inc.'s First Requests for Production of Documents (Nos. 1 – 21) and First Set of Interrogatories (Nos. 1 – 84) has been provided by (\*) hand delivery, (\*\*) email and U.S. Mail this 16th day of October 2003, to the following:

(\*) (\*\*) Adam Teitzman, Staff Counsel  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

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

(\*\*) Richard Chapkis  
Verizon Florida, Inc.  
201 North Franklin Street  
MC: FLTC0717  
Tampa, Florida 33602

(\*\*) Susan Masterton  
Sprint Communications Company  
1313 Blairstone Road  
Post Office Box 2214  
MC: FLTLHO0107  
Tallahassee, Florida 32301

(\*\*) Donna Canzano McNulty  
MCI WorldCom  
1203 Governors Square Boulevard  
Suite 201  
Tallahassee, Florida 32301

(\*\*) Tracy Hatch  
AT&T Communications of the  
Southern States, LLC  
101 North Monroe Street  
Suite 700  
Tallahassee, Florida 32301


(\*\*) Michael Gross  
Florida Cable Telecommunications  
246 East 6<sup>th</sup> Avenue  
Tallahassee, Florida 32302

(\*\*) Matthew Feil  
Florida Digital Network, Inc.  
390 North Orange Avenue, Suite 2000  
Orlando, Florida 32801

(\*\*) Jeffrey J. Binder  
Allegiance Telecom, Inc.  
1919 M Street, NW  
Washington, DC 20037

(\*\*) Floyd R. Self  
Messer, Caparello & Self  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32301

(\*\*) Nanette Edwards  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802

  
Vicki Gordon Kaufman