

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 27, 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 Networks Telephone Corporation, enclosed for filing and distribution are the original and 1 copy of the following:

- ▶ Networks Telephone Corporation's Amendment to and Clarification of Preliminary Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories.

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

Sincerely,

ba Joseph A. McGlothlin

JAM/mls
Enclosure

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

RECEIVED & FILED
Th
FPSC-BUREAU OF RECORDS

RECEIVED FPSC
OCT 27 PM 4:11
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 27, 2003

**NETWORK TELEPHONE CORPORATION'S AMENDMENT TO AND
CLARIFICATION OF PRELIMINARY OBJECTIONS TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST SET OF INTERROGATORIES**

Network Telephone Corporation ("Network Telephone") through its undersigned counsel, submits this Amendment To and Clarification of Objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories, and states:

In the Objections filed on October 20, 2003, Network Telephone reserved the right to modify or supplement its preliminary objections at the time Network Telephone filed its answers. Network Telephone has identified three matters, two of which are in the nature of clarification, with which it wishes to supplement the October 20 Objections. To provide as much notice as possible, Network Telephone is providing this Amendment.

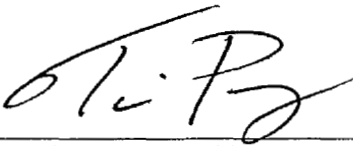
1. In General Objection No. 7, Network Telephone objected to interrogatories that ask for information already in BellSouth's possession. Network Telephone objected to Interrogatory No. 20 on the grounds that, with respect to BellSouth switching, BellSouth already has the requested information in its possession. Network Telephone also incorporates General Objection No. 7 as its objection to Interrogatory No. 19, which is related to Interrogatory No. 20.

2. In its General Objection No. 9, Network Telephone stated it would interpret each interrogatory as relating to intrastate Florida operations, and objected to those interrogatories that were not so limited on the grounds that such an application would be overbroad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible

evidence. So that it is clear, this objection relates, not only to interrogatories that are silent with respect to geographical scope, but also to Interrogatory No. 14 and any others that explicitly requested information for states other than Florida.

3. In its General Objection No. 6, Network Telephone objected to interrogatories that ask for proprietary, confidential information. Network Telephone included this objection in response to certain individual interrogatories. Also for clarification, General Objection No. 6 relates to all interrogatories of the First Set, whether or not Network Telephone was in a position on October 20 to identify each specific interrogatory to which it is applicable.

4. Except as amended herein, Network Telephone readopts its Objections dated October 20, 2003.


for Joseph A. McGlothlin
McWhirter, Reeves, McGlothlin, Davidson,
Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525
(850) 222-5606 (fax)
jmcglothlin@mac-law.com

Attorneys for Network Telephone Corporation

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Network Telephone Corporation's Amendment to and Clarification of Preliminary Objections to BellSouth's First Set of Interrogatories has been provided by (*) hand delivery, (**) email and U.S. Mail this 27th 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 6th 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

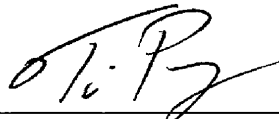
(**) Nanette Edwards
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, Alabama 35802

(**) Jake E. Jennings
Senior Vice-President
Regulatory Affairs & Carrier Relations
NewSouth Communications Corp.
NewSouth Center
Two N. Main Center
Greenville, SC 29601

(**) Jon C. Moyle, Jr.
Moyle, Flanigan, Katz, Raymond
& Sheehan, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301

(**)Rand Currier
Geoff Cookman
Granite Telecommunications, LLC
234 Copeland Street
Quincy, MA

(**)Andrew O. Isar
Miller Isar, Inc.
2901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335


for _____
Joseph A. McGlothlin