

ORIGINAL

Legal Department

Nancy B. White  
General Counsel - Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

October 30, 2003

RECEIVED- FPSC  
O3 OCT 30 PM 4: 13  
COMMISSION  
CLERK

Mrs. Blanca S. Bayó  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 030852-TP

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. served its Second Set of Interrogatories and First Request for Production of Documents to FDN Communications in the above referenced docket.

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,  
*Nancy B. White*  
Nancy B. White (KA)

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

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- SEC 1
- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE  
10782 OCT 30 03  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 030852-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail, and Hand Delivery\* this 30<sup>th</sup> day of October, 2003 to the following:

Jason Rojas, Staff Counsel \*  
Jeremy Susac, Staff Counsel  
Adam Teitzman, Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Phone: (850) 413-6212  
Fax: (850) 413-6250  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)  
[jrojas@psc.state.fl.us](mailto:jrojas@psc.state.fl.us)  
[jsusac@psc.state.fl.us](mailto:jsusac@psc.state.fl.us)

Michael A. Gross  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue, Ste. 100  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

Matthew Feil  
Scott Kassman  
FDN Communications  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801-1640  
Tel. No. 407 835-0460  
Fax No. 407 835-0309  
[mfeil@mail.fdn.com](mailto:mfeil@mail.fdn.com)  
[skassman@mail.fdn.com](mailto:skassman@mail.fdn.com)

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Kaufman & Arnold PA  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
[jmcglothlin@mac-law.com](mailto:jmcglothlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

Mr. Charles E. Watkins  
1230 Peachtree Street, NE  
19th Floor  
Atlanta, GA 30309-3574  
Phone: (404) 942-3492  
Fax: (404) 942-3495  
Represents Covad  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

Nanette Edwards, Esq.  
Director – Regulatory  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, AL 35802  
Tel. No. (256) 382-3856  
Represent ITC^DeltaCom  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

Ms. Donna C. McNulty  
MCI WorldCom Communications, Inc.  
1203 Governors Square Blvd.,  
Suite 201  
Tallahassee, FL 32301-2960  
Phone No. 850- 219-1008  
Fax No. 850 219-1018  
Represents MCI WorldCom  
[donna.mcnulty@mci.com](mailto:donna.mcnulty@mci.com)

De O'Roark, Esq.  
MCI WorldCom Communications, Inc (GA)  
Six Concourse Parkway  
Suite 3200  
Atlanta, GA 30328  
Represents MCI WorldCom  
[de.oroark@wcom.com](mailto:de.oroark@wcom.com)

Floyd Self, Esq.  
Norman H. Horton, Esq.~\*  
Messer Capareello & Self  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32301  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Represents ITC^DeltaCom  
Represents MCI  
Represents Xspedius~  
[fself@lawfla.com](mailto:fself@lawfla.com)  
[nhorton@lawfla.com](mailto:nhorton@lawfla.com)

Tracy Hatch, Esq.\*  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6364  
[thatch@att.com](mailto:thatch@att.com)

Lisa A. Sapper  
AT&T  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, GA 30309  
Tel. No. (404) 810-7812  
[lisariley@att.com](mailto:lisariley@att.com)

Marva Brown Johnson, Esq.  
KMC Telecom III, LLC  
1755 North Brown Road  
Lawrenceville, GA 30043-8119  
Tel. No. (678) 985-6261  
Fax No.: (678) 985-6213  
Represents KMC  
[marva.johnson@kmctelecom.com](mailto:marva.johnson@kmctelecom.com)

Richard A. Chapkis  
Kimberly Caswell  
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  
Represents Verizon  
[Richard.chapkis@verizon.com](mailto:Richard.chapkis@verizon.com)

Susan S. Masterton, Esq.  
Sprint-Florida, Inc.  
Sprint Communications Co. L.P.  
1313 Blair Stone Road  
P.O. Box 2214  
Tallahassee, FL 32316-2214  
Tel. No. (850) 599-1560  
Fax. No. (850) 878-0777  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

Jean Houck  
Business Telecom, Inc.  
4300 Six Forks Road  
Raleigh, NC 27609  
Tel. No. (919) 863-7325  
[jean.houck@btitelecom.net](mailto:jean.houck@btitelecom.net)

Jake E. Jennings  
NewSouth Communications Corp  
Two North Main Center  
Greenville, SC 29601-2719  
Tel. No.: 864 672-5877  
Fax No.: 864 672-5313  
[jejennings@newsouth.com](mailto:jejennings@newsouth.com)

AT&T by E-Mail only:  
soniadaniels@att.com

*Nancy B. White*  
Nancy B. White (KA)

(\*) Via Hand Delivery