

ORIGINAL



Tracy Hatch  
Senior Attorney  
Law and Government Affairs  
Southern Region

Suite 700  
101 N. Monroe Street  
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850-425-6360

November 6, 2003

**BY HAND DELIVERY**

Ms. Blanca Bayó, Director  
The Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

RECEIVED- FPSC  
03 NOV - 6 AM 10: 56  
COMMISSION  
CLERK

Re: Docket Nos. 981834-TP and 990321-TP

Dear Ms. Bayó:

Enclosed for filing are an original and one copy of AT&T Communications of the Southern States, LLC's Supplemental Responses to Staff's Sixth Set of Interrogatories in the above-referenced docket.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to Lisa Sapper in the enclosed stamped envelope.

Thank you for your assistance with this filing.

RECEIVED & FILED  
*lh*  
FPSC-BUREAU OF RECORDS

Sincerely yours,

*Tracy Hatch/las*

Tracy W. Hatch

TWH/las  
Enclosure  
cc: Parties of Record

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

DOCUMENT NUMBER-DATE  
11072 NOV -6 8  
FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

|   |   |                         |
|---|---|-------------------------|
| In re: Petition of Competitive Carriers for Commission  | ) | Docket No. 981834-TP    |
| Action to Support Local Competition in BellSouth        | ) |                         |
| Telecommunications Inc.'s Service Territory             | ) |                         |
| <hr/>   |   |                         |
| Petition of ACI Corp. d/b/a Accelerated Connections,    | ) | Docket No. 990321-TP    |
| Inc. for generic investigation to ensure that BellSouth | ) | Filed: November 6, 2003 |
| Telecommunications, Inc., Sprint-Florida,               | ) |                         |
| Incorporated, and GTE Florida Incorporated comply)      | ) |                         |
| with obligation to provide alternative local exchange   | ) |                         |
| carriers with flexible, timely, and cost-efficient      | ) |                         |
| physical collocation                                    | ) |                         |
| <hr/>   |   |                         |

**NOTICE OF SERVICE OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC's  
SUPPLEMENTAL RESPONSES TO STAFF'S SIXTH SET OF INTERROGATORIES (NOS.  
91-111)**

NOTICE IS HEREBY GIVEN that a true and correct copy of AT&T Communications of the Southern States, LLC's Supplemental Responses to Staff's Sixth Set of Interrogatories (Nos. 91-111), which were legally propounded by Staff on August 26, 2003, was sent via overnight delivery and electronic mail ([ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)) on November 5, 2003, to Adam Teitzman, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850.

The original and one copy of this Notice were also sent via overnight delivery on November 5, 2003 to the Director, Division of the Commission Clerk and Administrative services, at the Commission. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on November 6, 2003.

By: Tracy Hatch/law

Tracy W. Hatch  
Senior Attorney  
AT&T Communications of the Southern States, LLC  
101 N. Monroe Street, Suite 700  
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(850) 425-6360

**CERTIFICATE OF SERVICE  
DOCKET NOS. 981834 & 990321**

I HEREBY CERTIFY that a copy of the foregoing has been furnished via  
U.S. Mail this 6<sup>th</sup> day of November, 2003, to the following parties of record:

|   |   |
|---|---|
| <p>Adam Teitzman<br/>Staff Counsel<br/>Florida Public Service Commission<br/>2540 Shumard Oak Boulevard<br/>Tallahassee, FL 32399-0850</p>  | <p>Shook, Hardy &amp; Bacon, LLP<br/>Rodney L. Joyce<br/>600 14<sup>th</sup> Street N.W., Suite 800<br/>Washington, DC 20005-2004<br/>Phone: (202) 639-5602<br/>Fax: (202) 783-4211</p>   |
| <p>Ausley Law Firm<br/>Jeffry Wahlen<br/>P.O. Box 391<br/>Tallahassee, FL 32302<br/>Phone: 850-224-9115<br/>Fax: 222-7560</p>   | <p>BellSouth Telecommunications, Inc.<br/>Nancy B. White<br/>c/o Ms. Nancy H. Sims<br/>150 South Monroe Street, Suite 400<br/>Tallahassee, FL 32301-1556<br/>Phone: (850) 224-7798<br/>Fax: 222-8640</p>  |
| <p>Florida Digital Network, Inc.<br/>Matthew Feil, Esq.<br/>390 North Orange Ave., Suite 2000<br/>Orlando, FL 32801<br/>Phone: (407) 835-0460<br/>Fax: (407) 835-0309<br/>Email: <a href="mailto:mfeil@floridadigital.net">mfeil@floridadigital.net</a></p> | <p>Hopping Law Firm<br/>Richard Melson<br/>P.O. Box 6526<br/>Tallahassee, FL 32314<br/>Phone: 850-222-7500<br/>Fax: 224-8551</p>  |
| <p>Florida Cable Telecom. Assoc., Inc.<br/>Michael A. Gross<br/>246 E. 6th Avenue, Suite 100<br/>Tallahassee, FL 32303<br/>Phone: 850-681-1990<br/>Fax: 681-9676<br/>Email: <a href="mailto:mgross@fcta.com">mgross@fcta.com</a></p>                        | <p>Florida Competitive Carriers Assoc.<br/>c/o McWhirter Law Firm<br/>Vicki Kaufman<br/>117 S. Gadsden St.<br/>Tallahassee, FL 32301<br/>Phone: 850-222-2525<br/>Fax: 222-5606</p>  |
| <p>ITC^DeltaCom<br/>Ms. Nanette S. Edwards<br/>4092 S. Memorial Parkway<br/>Huntsville, AL 35802-4343<br/>Email: <a href="mailto:Nedwards@itcdeltacom.com">Nedwards@itcdeltacom.com</a></p>   | <p>KMC Telecom, Inc.<br/>Mr. John D. McLaughlin, Jr.<br/>1755 North Brown Road<br/>Lawrenceville, GA 30043-8119<br/>Phone: (678) 985-6262<br/>Fax: (678) 985-6213<br/>Email: <a href="mailto:jmclau@kmctelecom.com">jmclau@kmctelecom.com</a></p>                     |
| <p>Sprint-Florida, Inc.<br/>F.B. (Ben) Poag<br/>PO BOX 2214, MC FLTLHO0107<br/>Tallahassee, FL 32316-2214<br/>Phone: 850-599-1027<br/>Fax: 407-814-5700</p>   | <p>MCI WorldCom Communications, Inc.<br/>Ms. Donna C. McNulty<br/>1203 Governors Square Blvd., Suite 201<br/>Tallahassee, FL 32301-2960<br/>Phone: (850) 219-1008<br/>Fax: 219-1018<br/>Email: <a href="mailto:donna.mcnulty@wcom.com">donna.mcnulty@wcom.com</a></p> |

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|---|--|
| <p>Network Telephone Corporation<br/> Brent E. McMahan<br/> 815 South Palafox Street<br/> Pensacola, FL 32501-5937<br/> Phone: (850) 432-4855<br/> Fax: (850) 437-0724</p>  | <p>Pennington Law Firm<br/> Peter Dunbar/ Marc Dunbar<br/> P.O. Box 10095<br/> Tallahassee, FL 32302<br/> Phone: 850-222-3533<br/> Fax: 222-2126</p>                             |
| <p>Sprint Communications Company Limited Partnership<br/> Susan S. Masterton<br/> P.O. Box 2214<br/> MC: FLTLHO0107<br/> Tallahassee, FL 32316-2214<br/> Phone: (850) 847-0244<br/> Fax: 878-0777<br/> Email: <a href="mailto:susan.masterton@mail.sprint.com">susan.masterton@mail.sprint.com</a></p>          | <p>Supra Telecommunications &amp; Information Systems, Inc.<br/> Paul Turner<br/> 2620 S.W. 27th Avenue<br/> Miami, FL 33133<br/> Phone: 305-531-5286<br/> Fax: 305-476-4282</p> |
| <p>Covad Communications<br/> William H. Weber / Gene Watkins<br/> 19<sup>th</sup> Floor<br/> 1230 Peachtree Street N.E.<br/> Atlanta, GA 30309<br/> Phone: (404) 942-3494<br/> Fax: (404) 942-3495</p>  | <p>Verizon Florida Inc.<br/> Mr. Richard Chapkis<br/> 201 N. Franklin Street, MCFLTC0007<br/> Tampa, FL 33601<br/> Phone: (813) 483-2606<br/> Fax: (813) 204-8870</p>            |
| <p>Beth Keating, Esq.d<br/> Division of Legal Services<br/> Florida Public Service Commission<br/> 2540 Shumard Oak Boulevard<br/> Tallahassee, FL 32399-0870</p>   | <p>MediaOne Florida Telecom., Inc.<br/> c/o Laura L. Gallagher, P.A.<br/> 101 E. College Ave., Suite 302<br/> Tallahassee, FL 32301</p>  |
| <p>BellSouth Telecom., Inc.<br/> Patrick W. Turner/R. Douglas Lackey<br/> 675 W. Peachtree St., Suite 4300<br/> Atlanta, GA 30375</p>   | <p>Messer Law Firm<br/> Floyd Self/Norman Horton<br/> PO BOX 1876<br/> Tallahassee, FL 32302</p>   |
| <p>Verizon Florida Inc.<br/> Ms. Michelle A. Robinson<br/> c/o Mr. David Christian<br/> 106 East College Avenue, Suite 810<br/> Tallahassee, FL 32301-7704<br/> Phone: (813) 483-2526<br/> Fax: (813) 223-4888<br/> Email: <a href="mailto:Michelle.Robinson@verizon.com">Michelle.Robinson@verizon.com</a></p> | <p>Daniel McCuaig<br/> Wilmer Cutler &amp; Pickering<br/> 2445 M Street, N.W.<br/> Washington, DC 20037-1420</p>   |
| <p>J.P. Carver<br/> BellSouth Telecommunications, Inc.<br/> 150 S. Monroe Street, Suite 400<br/> Tallahassee, FL 32301-1556</p>   | <p>Scott A. Kassman<br/> FDN Communications<br/> 390 North Orange Avenue, Suite 2000<br/> Orlando, FL 32810</p>  |

Tracy Hatch, Esq.

Tracy W. Hatch