

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: November 10, 2003

**OBJECTIONS OF ICG TELECOM GROUP, INC. TO  
BELLSOUTH'S SECOND SET OF INTERROGATORIES  
AND  
BELLSOUTH'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

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ICG Telecom Group, Inc. ("ICG"), through its undersigned counsel, submits its preliminary objections to BellSouth Telecommunications, Inc.'s ("BellSouth") Second Set of Interrogatories and Second Request for Production of Documents to ICG.

These objections are preliminary in nature. Should additional grounds for objection be discovered as ICG prepares its responses to any discovery, ICG reserves the right to supplement these objections.

Further, at the time of the filing of these objections, the issues to be addressed in this proceeding have not yet been identified. Should additional grounds for objections develop as the Commission identifies the issues to be addressed in this proceeding, ICG reserves the right to supplement these objections.

**GENERAL OBJECTIONS**

ICG makes the following general objections to the Second Set of Interrogatories and Second Request for Production of Documents (together, the "Second Discovery Requests"):

- 1. ICG objects to the "Definitions" section, the "General Instructions," and the individual items of BellSouth's Second Discovery Requests to ICG to the extent that they are

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overly broad, that they are unduly burdensome and oppressive, and in that they are excessively time consuming and expensive.

2. ICG objects to the “Definitions,” the “General Instructions,” and the individual items of the Second Discovery Requests to the extent they seek irrelevant information and are not reasonably calculated to lead to the discovery of admissible evidence. In that regard, ICG objects, among other things, to interrogatories that seek information that is unrelated to or inconsistent with the methodology and parameters of the analysis of impairment prescribed by the FCC in its Triennial Review Order. By way of illustration of this objection, and without limiting its right to identify other examples of discovery requests that are objectionable on this basis, ICG objects to items that relate to its individual revenues, costs, profitability, financial criteria, means and strategies of entering particular markets, and other financial and strategic aspects of its operations, on the grounds that the FCC ruled in the Triennial Review Order that the impairment analysis is not to be based on business models of particular individual carriers. Further, and again by way of illustration and not limitation, ICG objects to discovery requests that relate to enterprise customers and/or services on the grounds they are beyond the scope of the issues in this proceeding, and therefore are irrelevant and are not reasonably calculated to lead to the discovery of admissible evidence.

3. ICG objects to the “Definitions,” the “General Instructions,” and the individual items of the Second Discovery Requests to the extent they are vague, ambiguous, imprecise, and utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these items.

4. ICG objects to the “General Instructions” and the items of BellSouth’s Second Discovery Requests to ICG to the extent that they purport to impose discovery obligations on

ICG that exceed the scope of discovery allowed by the applicable Florida Rules of Civil Procedure. By way of illustration and not limitation, ICG objects to instructions that purport to impose “continuing” requests and obligations. ICG also objects to interrogatories and requests for documents that would require ICG to create information or a document that does not exist or prepare information in a manner in which ICG does not maintain it.

5. ICG objects to BellSouth’s Second Discovery Requests to the extent that the interrogatories and the request for production of documents seek discovery of materials and/or information protected by the attorney/client privilege, the work product doctrine, the accountant/client privilege, and any other applicable privilege

6. ICG objects to BellSouth’s Second Set of Interrogatories and Second Request for Production of Documents to the extent that the items would require disclosure of information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed (provided the information is otherwise discoverable) only pursuant to the terms of a mutually acceptable confidentiality agreement and use of the Commission’s rules and procedures relating to confidential and proprietary information.

7. ICG objects to all interrogatories which would require ICG to provide information which is already in BellSouth’s possession or is in the public record before the Commission. To require ICG to duplicate information that BellSouth already has or is readily available to BellSouth would be unduly burdensome and oppressive.

8. ICG objects to BellSouth’s Second Discovery Requests to the extent BellSouth seeks to impose an obligation on ICG to respond on behalf of subsidiaries and/or former officers,

employees, agents, and directors on the grounds that such requests for production are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

9. ICG will interpret each interrogatory and the request for documents as relating to intrastate Florida operations within BellSouth's service area. To the extent any interrogatories are not intended to relate to Florida intrastate operations within BellSouth's Florida service area, ICG objects to such interrogatories as overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

10. ICG objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms, with the exception to services specifically listed within the FCC's rule, are subject to differing interpretations.

11. ICG objects to interrogatories and/or requests for documents that require the identification or production of "all," "every," or "any" information on documents as overbroad and unduly burdensome.

12. ICG objects to any discovery request that is not limited in time or is not limited to a period of time that is relevant to the issues before the Commission and/or reasonably related to BellSouth's legitimate discovery needs.

### **SPECIFIC OBJECTIONS**

To the extent possible at this point, ICG will indicate its objections to specific discovery requests within the Second Set of Interrogatories and the Second Request for Production of Documents. Such objections are, of necessity, preliminary. ICG reserves the right to modify, supplement and/or enlarge on these objections when it provides its responses.

85. Identify each market in the U.S. where you provide local telephone service, the year and month when you first offered local exchange service, the type of customers (residence or business) you serve, and the number of lines served in each market.

**Response:** ICG incorporates by reference the following general objections listed above as applicable to this interrogatory:

1, 2,3, 4, 6, 7, 9, 12

86. For those end user customers to whom you provide qualifying and non-qualifying service in the state of Florida, state the average monthly revenues (and identify the revenue separately for qualifying and non qualifying services, local and long distance services, and any other services) you receive from each such end user customer for those customers:

- a. End users with 1 line;
- b. End users with 2 lines;
- c. End users with 3 lines;
- d. End users with 4 lines;
- e. End users with 5 lines;
- f. End users with 6 lines;
- g. End users with 7 lines;
- h. End users with 8 lines;
- i. End users with 9 lines;
- j. End users with 10 lines;
- k. End users with 11 lines;
- l. End users with 12 lines;
- m. End users with 13 lines;
- n. End users with 14 lines;
- o. End users with 15 lines;
- p. End users with 16 lines;
- q. End users with 17 lines;
- r. End users with 18 lines;
- s. End users with 19 lines;
- t. End users with 20 lines;
- u. End users with 21 lines;
- v. End users with 22 lines;
- w. End users with 23 lines;
- x. End users with 24 lines;
- y. End users with more than 24 lines.

**Response:** ICG incorporates by reference the following general objections, and states they are applicable to all subparts of this interrogatory:

1, 2, 3, 4, 6, 9, 10,12

87. For each class or type of end user customer you identified in response to BellSouth's 1<sup>st</sup> Interrogatories, Request No. 33, state the general and administrative (G&A) expenses in Florida.

**Response:** ICG incorporates by reference the following general objections stated above, and states they are applicable to this interrogatory:

1, 2, 4, 6, 9,12

88. Provide your revenues, separately identified by qualifying and non-qualifying services, in Florida for the period 1996 through present.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 4, 6, 9,10,12

89. Provide a statement of income (1996 through present) or profitability for each market in Florida or for the most granular level that you have in Florida.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 4, 6, 9,12

90. For each 100 of the types of end user customers identified in your response to BellSouth's Second Interrogatories, Item No. 86 above, state how many are added as a result of:

- a. Telemarketing;
- b. Direct mail
- c. Customer-initiated call for service;
- d. Customer-initiated Internet request for service;
- e. Direct contact (other than telemarketing) from service rep;
- f. Other Sales Channel (please describe)

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory and its subparts:

1, 2, 3, 4, 6, 10, 12

91. For the customer identified in response to BellSouth's Second Interrogatories, Request No. 86 above, identify with particularity the average customer acquisition cost by sales channel.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 3, 4, 6, 10, 12

92. Describe with particularity whether and how you use (a) newspaper (b) television (c) radio media to (d) direct mail marketing and telemarketing to attract residential or other business subscribers. Identify all documentation you relied upon to support your response

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 3, 4, 6, 9, 11, 12

93. For each of the sales channels identified in your response to BellSouth's Second Interrogatories, Request No. 90 and as related to each customer line size as described in 86 above, provide a take rate per product offering as measured as a percentage of the number of potential customers actually contacted.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 3, 4, 6, 9, 10, 12

94. Identify the percentage of your customers by line size as described in your response to BellSouth's second Interrogatories, Request No. 86 above, that accept your service under a bundle or package that includes any combination of local service, long distance, DSL or other data product or voicemail. Identify all documentation you relied upon to support your response.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 3, 4, 6,9, 10

95. Describe the criteria you consider to enter a specific market offering qualified services. In your response please detail how, and the extent to which, you rely on both business customers and residential customers to meet the financial criteria. Also identify the criteria used to select the customers that are marketed to or contacted in your marketing campaigns.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 3, 4, 6, 9, 10, 12

96. What percentage of the total lines in each market in Florida satisfy the criteria described in your response to 95?



**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 3, 4, 6, 9, 10, 12

97. For each of the customer line counts described in our response to BellSouth's Second Interrogatories, Request No. 86 above, please provide the quantity and percentage of customers that accept your service for:
- a. local, long distance and Voicemail;
  - b. local and long distance;
  - c. Local, long distance, and DSL or other data product.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 3, 4, 6, 9, 10, 12

98. Please provide, on a customer segment basis (residence, small business, large business), or the next most granular level available, the quantity and percentage of your customers that accept service, without purchasing a package (a la carte).

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 3, 4, 6, 9, 12

99. Please identify all documents and underlying data that you use to compute churn rates.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 3, 4, 6, 9, 11, 12

- 100 Please provide your bad debt expense as a percentage of revenue over the period 1996 to present.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 3, 4, 6, 9, 12

101. With regard to long distance services, please provide the following:
- a. your average revenue per minute (ARPU) for long distance service in the state;
  - b. average revenue per minute (ARPU) for long distance service in the state for residential customers;
  - c. average revenue per minute (ARPU) for long distance service in the state for business customers in total;
  - d. average revenue per minute (ARPU) for long distance service in the state for business customers with 1-3 lines
  - e. average revenue per minute (ARPU) for long distance service in the state for business customers with 4-8 lines.
  - f. Average revenue per minute (ARPU) for long distance service in the state for business customers with 9-23 lines.
  - g. Average revenue per minute (ARPU) for long distance service in the state and for business customers with 24 or more lines.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory and its subparts:

1, 2, 3, 4, 6, 9, 12

102. With regard to bundles of local and long distance services offered to retail customers:
- a. Provide the proportion or percentage (nationally) of residential customer that receive a bundled offering of local and long distance service.
  - b. Provide the proportion (for the state) of residential customers that receive a bundled offering of local and long distance service.
  - c. Provide the average monthly revenue per customer for those customers with 1 line and with 2 lines.
  - d. Provide the proportion (nationally) of your business customers that received a bundled offering of local and long distance service.
  - e. Provide the proportion (for the state) of your business customers that receive a bundled offering of local and long distance service.
  - f. Provide the average monthly revenue per customer for those customers with 4 lines and with 5 lines.
  - g. Provide the proportion (nationally) of business customers with 1-3 lines that receive a bundled offering of local and long distance service.

- h. Provide the proportion (in the state) of business customers with 1-3 lines that receive a bundled offering of local and long distance service.
- i. Provide the average monthly revenue per customer for those customers identified with 7 lines and with 8 lines.
- j. Provide the proportion (nationally) of business customers with 4-8 lines that receive a bundled offering of local and long distance service.
- k. Provide the proportion (in the state) of business customers with 4-8 lines that receive a bundled offering of local and long distance service.
- l. Provide the average monthly revenue per customer for those customers with 10 lines and with 11 lines.

**Response:** ICG incorporates by reference the following items general objections listed above, and states they are applicable to this interrogatory and its subparts:

1, 2, 3, 4, 6, 9, 12

103. With respect to your retail bundled offerings that include DSL or Data Services:
- a. Provide the proportion (nationally and for the state) of residential customer that receive a bundled offering that includes DSL.
  - b. Provide the average price discount for such bundles from the retail rates in a.
  - c. Provide the proportion (nationally, and for the state) of business customers that receive a bundled offering including DSL or data services.
  - d. Provide the average price discount for such bundles from the retail rates in c.
  - e. Provide the proportion (nationally, and for the state) of business customers in the 1-3 line size that receive a bundled offering including DSL or data services.
  - f. Provide the average price discount for such bundles from the retail rates in e.
  - g. Provide the proportion (nationally, and for the state) of business customers in the 4-8 line size that receive a bundled offering including DSL or data services.
  - h. Provide the average price discount for such bundles from the retail rates in g.
  - i. Provide the proportion (nationally, and for the state) of business customers in the 9-23 line size that receive a bundled offering including DSL or data services.
  - j. Provide the average price discount for such bundles from the retail rates in i.
  - k. Provide the proportion (nationally, and for the state) of business customers with 24 or more lines that receive a bundled offering including data services.
  - l. Provide the average price discount for such bundles from the retail rates in k.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory and its subparts:

1, 2, 3, 4, 6, 9, 12

104. With respect to any discounts you offer on long distance services:

- a. Provide the approximate proportion of your long distance business customers that receive service via a contract with a volume and/or long term discount. Provide the response by:
  - i. Business with 1-3 lines
  - ii. Businesses with 4-8 lines
  - iii. Businesses with 9-23 lines
  - iv. Businesses with 24 or more lines
- b. For the answer in a above, approximately what is the discount in percentage terms for each line size?
- c. For the answer in a above, approximately what is the range of terms for each line size?
- d. Provide the approximate proportion of your long distance residential customers that receive service via a contract with a volume and/or term discount.
- e. For the answer in c above, approximately what is the discount in percentage terms?
- f. What is the lowest price per minute that the company sells to a customer for long distance service?
- g. For the question e above, what terms and conditions are require in order to obtain this rate?

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 3, 4, 6, 9, 11, 12

105. With respect to any long distance services you provide:

- a. What proportion of your total long distance service that is provided to customers nationally is provided through your own switches?
- b. What proportion of your total long distance service that is provided to customers nationally is not provided through your own switches?
- c. What proportion of your total long distance service that is provided to customers in the state of Florida is provided through your own switches?
- d. What proportion of your total long distance service that is provided to customers in the state of Florida is not provided through your own switches?
- e. What proportion of your total long-distance service that is provided to customers nationally is provided via resale of another Company's long distance service?
- f. What proportion of your total long distance service that is provided to customers nationally is not provided via resale of another Company's long distance service? Provide annual number of long distance minutes that are not resold nationally.
- g. For resold long distance service, what is the average cost per minute (i.e. the average amount paid to the reselling company per minute) for long distance service provided to customers in the state of Florida?

- h. For g above, does this include nonrecurring charges?
- i. For resold long distance service, what is the average cost per minute (i.e average amount paid to the reselling company per minute) for long distance service provided to customers in the state of Florida?
- j. For answer g, under what terms and conditions do you purchase the resold service?
- k. For answer I, under what terms and conditions do you purchase the resold service?

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory and its subparts:

1, 2, 3, 4, 6, 9, 12

106. Identify the retail rates you charge for special access or similar transport services offered to customers. Your response should include all relevant non-recurring and recurring rates you charge your customers.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1,2, 3, 4, 6, 9, 12

- 107 With respect to transport material prices you pay for equipment:
- a. What is the average vendor discount (in percentage)from vendor retail prices you receive for 1/0 multiplexer equipment?
  - b. Provide the material prices, year of acquisition, capacity expressed in DS0 equivalents and the engineered utilization for the most recent acquisitions of 1/0 multiplexer equipment.
  - c. What is the average vendor discount (in percentage) from vendor retail prices the company receives for 3/1 multiplexer equipment?
  - d. Provide the material prices, year of acquisition, capacity expressed in DS0 equivalents and the engineered utilization for the most recent acquisitions of 3/1 multiplexer equipment.
  - e. What is the average vendor discount (in percentage) from vendor retail prices the company receives for optical fiber?
  - f. Provide the material prices, year of acquisition, fiber capacity and the engineered utilization for the most recent acquisitions of optical fiber?

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory and its subparts:

1, 2, 3, 4, 6, 9, 12

108. With respect to the cost you pay for leased transport capacity:

- a. Provide the monthly price(s) paid for most recent lease of DS1 capacity from a company other than BellSouth. Include all monthly rate elements such as per termination and/or per mile rates.
- b. Provide the non-recurring price(s) paid for most recent lease of DS1 capacity from a company other than BellSouth. Include all non-recurring rate elements.
- c. Provide the monthly price(s) paid for most recent lease of DS3 capacity from a company other than BellSouth. Include all monthly rate elements such as per termination and/or per mile rates.
- d. Provide the non-recurring price paid for most recent lease of DS3 capacity from a company other than BellSouth. Include all non-recurring rate elements.
- e. Provide the monthly price(s) paid for most recent lease of OC3 capacity from a company other than BellSouth. Include all monthly rate elements such as per termination and/or per mile rates.
- f. Provide the non-recurring price(s) paid for most recent lease of OC3 capacity from a company other than BellSouth. Include all non-recurring rate elements.
- g. Provide the monthly price(s) paid for most recent lease of OC12 capacity from a company other than BellSouth. Include all monthly rate elements such as per termination and/or per mile rates.
- h. Provide the non-recurring prices paid for most recent lease of OC12 capacity from a company other than BellSouth. Include all non-recurring rate elements.
- i. Provide the monthly prices paid for most recent lease of OC48 capacity from a company other than BellSouth. Include all monthly rate elements such as per termination and/or per mile rates.
- j. Provide the non-recurring prices paid for most recent lease of OC48 capacity from a company other than BellSouth. Include all non-recurring rate elements.
- k. Provide the monthly prices paid for most recent lease of OC192 capacity from a company other than BellSouth. Include all monthly rate elements such as per termination and/or per mile rates.
- l. Provide the non-recurring prices paid for most recent lease of OC192 capacity from a company other than BellSouth. Include all non-recurring rate elements.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory and its subparts:

1, 2, 3, 4, 6, 9, 11, 12

109. With respect to the prices you pay for voice mail equipment:

- a. What is the average vendor discount (in percentage) from vendor retail prices you receive for voice mail equipment?
- b. Provide the material prices, year of acquisition, capacity expressed in number of voice mailboxes and the engineered utilization for the most recent acquisitions of voice mail equipment.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory and its subparts:

1, 2, 3, 4, 6, 9, 12

110. With respect to the prices you pay for Operator Assistance Costs:

- a. What proportion of your total operator services provided to customers nationally is provided via resale of another Company's operator service? Provide annual number of operator minutes that are resold nationally.
- b. What proportion of your total operator services that is provided to customers nationally is not provided via resale of another Company's operator service?
- c. For resold operator service, what is the average cost per minute (i.e., the average amount paid to the reselling company per minute) for operator services provided to customers nationally?
- d. For resold operator service, what is the average cost per minute (i.e., the average amount paid to the reselling company per minute) for operator service provided to customers in the state of Florida?
- e. For answer c above under what terms and conditions do you purchase the resold service?

**Response:** ICG incorporates by reference the following general objections stated above, and states they are applicable to this interrogatory and its subparts:

1, 2, 3, 4, 6, 9, 12

111. In the FCC's Triennial Review Order, TRO, released August 21, 2003, it discusses determination of economic entry on the basis of the "most efficient business model" and "most efficient network architecture" (Par. 517):

- a. Do you employ "the most efficient business model" as that phrase is used in 517 of the TRO? Explain with particularity your answer.
- b. Do you employ "the most efficient network architecture" as that phrase is used at paragraph 517 of the TRO? Explain with particularity your answer.
- c. Are you the least cost competitive (CLEC) provider in the state?

- d. If the answer to c is anything other than an unqualified no, please identify which provider you believe is the least cost provider.
- e. If the answer to c is anything other than an unqualified no, please estimate the percentage by which you believe your costs exceed (on an average basis) the costs of the least cost competitive provider.

**Response:** ICG incorporates by reference the following of the general objections listed above and states they are applicable to this interrogatory and its subparts:

2, 3, 4, 6, 9, 12

112. If you offer long distance services to your customers, state for each state in the Bellsouth region the average access charges you pay for (a) originating and (b) terminating long distance services. An average based on the most recently available month or quarter will be sufficient.

**Response:** ICG incorporates by reference the following general objections listed above, and states they are applicable to this interrogatory:

1, 2, 3, 4, 6, 9, 12

**REQUESTS FOR PRODUCTION OF DOCUMENTS (No. 22)**

22. Please produce all documents identified in response to these Interrogatories.



**Response:** ICG incorporates by reference its objections to each item Second Set of Interrogatories. ICG objects to the disclosure of proprietary and confidential business information.

The undersigned has provided the above objections.



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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Objections of ICG Telecom Group, Inc to BellSouth's Second Set of Interrogatories and Second Request for Production of Documents has been provided by (\*) hand delivery, (\*\*) email and U S. Mail this 10th day of November 2003, to the following:

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