

ORIGINAL

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

03 DEC -1 PM 4: 34

In re: Petition by Verizon Florida Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes.

DOCKET NO. 030867-TL

COMMISSION
CLERK

In re: Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes.

DOCKET NO. 030868-TL

In re: Petition for implementation of Section 364.164, Florida Statutes, by rebalancing rates in a revenue-neutral manner through decreases in intrastate switched access charges with offsetting rate adjustments for basic services, by BellSouth Telecommunications, Inc.

DOCKET NO. 030869-TL

SERVED: December 1, 2003

AARP's RESPONSES TO BELL SOUTH'S SECOND SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO AARP

AARP, pursuant to Rule 28-106.206, F.A.C and Rules 1.340 and 1.280, Fla.R.Civ.P, hereby files its responses to BellSouth's Second Set of Interrogatories (1-10) and BellSouth's Second Request for Production of Documents.

SPECIFIC RESPONSES

REQUEST:

1. Please state the average income for AARP's members. Provide the average income for the last five years.

RESPONSE

AARP does not know the income of all its members and, thus, does not possess data showing the average income of its members.

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COM _____
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MMS _____
SEC _____
OTH _____

1 pg to each docket

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

REQUEST:

2. Please state the range of income for AARP's members. Provide the range of income for the last five years.

RESPONSE

AARP does not know the income of all its members and, thus, does not possess data showing the range of income of its members.

REQUEST:

3. Please provide an approximate breakdown of the AARP members who (a) receive flat rate basic local exchange service without any optional or vertical features; (b) receive flat rate basic local exchange service with one additional optional or vertical feature; (c) receive flat rate basic local exchange service with two or more optional or vertical features; (d) receive packaged service or bundled service.

RESPONSE

AARP does not possess the necessary information to provide the breakdown of services taken requested in this interrogatory.

REQUEST:

4. Please state the approximate number of AARP members who qualify for Lifeline/Linkup assistance. "Lifeline/Linkup assistance" refers to a low-income assistance program available to qualified residential customers.

RESPONSE

AARP does not have the income data necessary to calculate qualification of its members for telephone financial assistance programs.

REQUEST:

5. Please state the approximate number of AARP members who participate in or receive Lifeline/Linkup assistance (as defined in Interrogatory No. 4).

RESPONSE

AARP does not have the data necessary to calculate participation of its members in telephone financial assistance programs.

REQUEST:

6. Please state the approximate number of AARP members who have more than one residential address.

RESPONSE

AARP does not have the data necessary to approximate the number of its members who have more than one residential address.

REQUEST:

7. Please state the approximate number of AARP members who also have one or more of the following: cellular telephone, facsimile machine, second telephone line, electronic mail address.

RESPONSE

AARP does not have the data necessary to approximate the number of its members that have one or more of the services or devices requested in this interrogatory.

REQUEST:

8. Please state the approximate number of AARP members who subscribe to cable or satellite TV service.

RESPONSE

AARP does not have the data necessary to approximate the number of its members who subscribe to the services listed in this interrogatory.

REQUEST:

9. Referring to your petition, which states that AARP has 50 offices in 50 states and elsewhere, state how much an AARP member pays on average for local telephone service.

RESPONSE

AARP does not have the data necessary to state how much an AARP member pays on average for local telephone service.

REQUEST:

10. Provide the average amount that an AARP member pays for local telephone

service by year for the past five years.

RESPONSE

AARP does not have the data necessary to state how much an AARP member pays on average for local telephone service by year for the past five years.

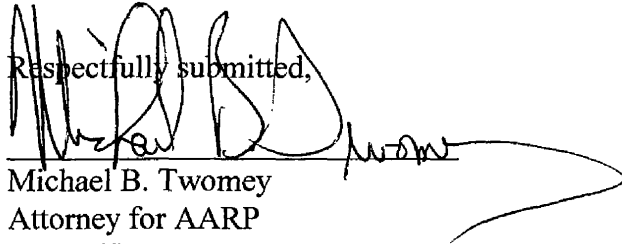
PRODUCTION OF DOCUMENTS

REQUEST:

1. Provide any documents that evidence, refer to, or relate to your responses to BellSouth's Second Interrogatories.

RESPONSE:

AARP has no such documents to provide.

Respectfully submitted,


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this document has been served by either hand delivery or overnight mail and by either facsimile transmission or electronic mail messaging this 1st day of December, 2003 on the following:

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