

ORIGINAL

LAW OFFICES  
Messer, Caparello & Self  
A Professional Association

Post Office Box 1876  
Tallahassee, Florida 32302-1876  
Internet: www.lawfla.com

COMMISSION  
CLERK

03 DEC 29 PM 4: 28

RECEIVED - FPSC

December 29, 2003

**BY HAND DELIVERY**

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

Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom d/b/a Grapevine, ("ITC^DeltaCom"), its parent, Interstate FiberNet, Inc. and Business Telecom, Inc. are an original and one copy of ITC's Notice of Serving Responses to Staff's Second Set of Interrogatories (Nos. 8-11) and Second Request for Production of Documents (No. 9) in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Sincerely yours,

Floyd R. Self

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_ FRS/amb
- ECR \_\_\_\_\_ Enclosures
- GCL \_\_\_\_\_ cc: Parties of Record
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- SEC \_\_\_\_\_
- OTH \_\_\_\_\_

DOCUMENT NUMBER - DATE

13516 DEC 29 03

FPSC-COMMISSION CLERK

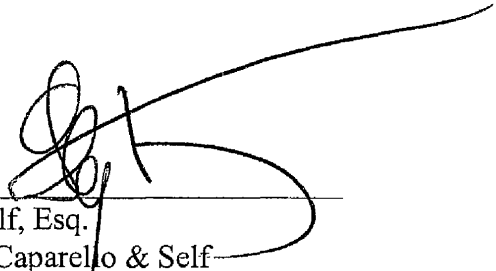
**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Implementation of Requirements )  
Arising From Federal Communications )  
Commission Triennial UNE Review: ) Docket No.: 030851-TP  
Local Circuit Switching for Mass ) Filed: December 29, 2003  
Market Customers )  
\_\_\_\_\_ )

**ITC^DELTA COM AND BTI'S NOTICE OF SERVING RESPONSES TO  
STAFF'S SECOND SET OF INTERROGATORIES (NOS. 8-11) AND  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 9)**

ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom and BTI Corporation, by and through its undersigned counsel, hereby files and serves Notice that it has served its Responses to Staff's Second Set of Interrogatories (Nos. 8-11) and Second Request for Production of Documents (No. 9) by e-mail on Jeremy Susac, Esq. at [jsusac@psc.state.fl.us](mailto:jsusac@psc.state.fl.us) and by Hand Delivery to Jeremy Susac, Esq., Office of General Counsel, Room 370, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 this 29<sup>th</sup> day of December, 2003.

Respectfully submitted,



Floyd Self, Esq.  
Messer, Caparello & Self  
215 S. Monroe Street, Suite 701  
Tallahassee, FL 32302  
(850) 222-0720

and

Nanette S. Edwards, Esq.  
Director --Regulatory  
ITC^DeltaCom Communications, Inc.  
4092 S. Memorial Parkway  
Huntsville, AL 35802  
(256) 382-3856

Attorneys for ITC^DeltaCom Communications, Inc.

DOCUMENT NUMBER DATE

13516 DEC 29 03

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery (\*), electronic mail, and/or U. S. Mail this 29<sup>th</sup> day of December, 2003.

Jeremy Susac, Esq.\*  
Office of General Counsel, Room 370  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Jason Rojas, Esq.\*  
Office of General Counsel, Room 370  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Nancy B. White  
c/o Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301

Susan S. Masterton, Esq.  
Sprint-Florida, Incorporated  
Sprint Communications Company Limited  
Partnership  
P.O. Box 2214  
Tallahassee, FL 32316-2214

Richard A. Chapkis, Esq.  
Verizon Florida Inc.  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110

Nanette Edwards  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, AL 35802

Mr. James White  
ALLTEL  
601 Riverside Avenue  
Jacksonville FL 32204-2987

Ms. Laurie A. Maffett  
Frontier Telephone Group  
180 South Clinton Avenue  
Rochester NY 14646-0700

Mr. R. Mark Ellmer  
GT Com  
P. O. Box 220  
Port St. Joe FL 32457-0220

Mr. Robert M. Post, Jr.  
ITS Telecommunications Systems, Inc.  
P. O. Box 277  
Indiantown FL 34956-0277

Ms. Harriet Eudy  
NEFCOM  
11791 110th Street  
Live Oak FL 32060-6703

Ms. Lynn B. Hall  
Smart City Telecom  
P. O. Box 22555  
Lake Buena Vista FL 32830-2555

Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecommunications Assoc., Inc.  
246 E. 6<sup>th</sup> Avenue  
Tallahassee, FL 32301

Tracy W. Hatch, Esq.  
AT&T Communications of the Southern States, LLC  
101 N. Monroe Street, Suite 701  
Tallahassee, FL 32301

Lisa Sapper  
AT&T  
1200 Peachtree Street, NE, Suite 8100  
Atlanta, GA 30309

Donna McNulty, Esq.  
WorldCom  
1203 Governors Square Blvd, Suite 201  
Tallahassee, FL 32301-2960

De O'Roark, Esq.  
MCI WorldCom Communications, Inc.  
6 Concourse Parkway, Suite 600  
Atlanta, GA 30328

Vicki Kaufman, Esq.  
Joe McGlothlin, Esq.  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
117 S. Gadsden Street  
Tallahassee, FL. 32301

Marva Brown Johnson, Esq.  
KMC Telecom III, LLC  
1755 North Brown Road  
Lawrenceville, GA 30034-8119.

Charles V. Gerkin, Jr.  
Regulatory Counsel  
Allegiance Telecom, Inc.  
9201 North Central Expressway  
Dallas, TX 75231

Terry Larkin  
Allegiance Telecom, Inc.  
Regional Vice President  
700 East Butterfield Road  
Lombard, IL 60148

James C. Falvey, Esq.  
Senior Vice president, Regulatory Affairs  
Xspedius Communications, LLC  
7125 Columbia Gateway Drive, Suite 200  
Columbia, MD 21046

Norman H. Horton, Jr.  
Messer, Caparello & Self, P.A.  
P.O. Box 1876  
Tallahassee, FL 32302-1876

Mr. Jake E. Jennings  
NewSouth Communications Corp.  
Two N. Main Center  
Greenville, SC 29601

Jon C. Moyle, Jr., Esq.  
Moyle, Flanigan, Katz, Raymond & Sheehan, P.A.  
118 North Gadsden Street  
Tallahassee, FL 32301

Charles E. Watkins  
Covad Communications Company  
1230 Peachtree Street, NE, 19<sup>th</sup> Floor  
Atlanta, GA 30309

Rand Currier  
Granite Telecommunications, LLC  
234 Copeland Street  
Quincy, MA 02169

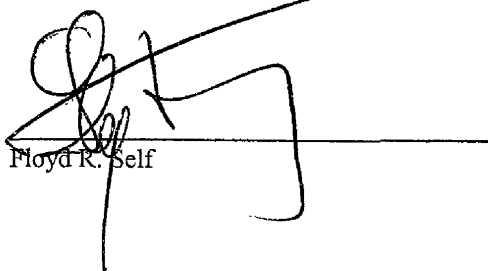
Andrew O. Isar  
Miller Isar, Inc.  
7901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335

Jorge Cruz-Bustillo, Esq.  
Supra Telecommunications and  
Information Systems, Inc.  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, Florida 33133

Mr. Jonathan Audu  
Supra Telecommunications and  
Information Systems, Inc.  
1311 Executive Center Drive, Suite 220  
Tallahassee, FL 32301

Thomas M. Koutsky  
Vice president, Law and Public Policy  
Z-Tel Communications, Inc.  
1200 19<sup>th</sup> Street, N.W., Suite 500  
Washington, DC 20036

Michael B. Twomey  
P.O. Box 5256  
Tallahassee, FL 32314-5256



Floyd R. Self