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February 5, 2004

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Mrs. Blanca S. Bayó  
Director, 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: Implementation of requirements arising from  
Federal Communications Commission's Triennial UNE Review: Local-  
Specific Review for DS1, DS3, and Dark Fiber Transport**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response in Opposition to FCCA's Motion to Compel, and, In The Alternative, Motion to Strike, which we ask that you file in the captioned 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.

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FPSC-BUREAU OF RECORDS

Sincerely,  
*Nancy B. White*  
Nancy B. White (CA)

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

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery\* and FedEx this 5<sup>th</sup> day of February 2004 to the following:

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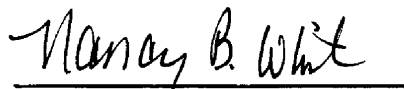
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Nancy B. White (lks.)

**(+) signed protective agreement**  
**(\*) via Hand Delivery**  
**(⊗) via FedEx**

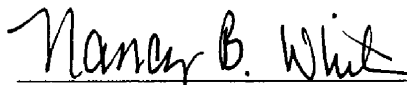
**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising )  
from Federal Communications Commission )  
triennial UNE review: Location-Specific Review ) Docket No. 030852-TP  
for DS1, DS3 and Dark Fiber Loops, and )  
Route-Specific Review for DS1, DS3 and Dark ) Filed: February 5, 2004  
Fiber Transport )  
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**BELLSOUTH TELECOMMUNICATION, INC.'S RESPONSE IN OPPOSITION  
TO FCCA'S MOTION TO COMPEL, AND,  
IN THE ALTERNATIVE, MOTION TO STRIKE**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits its response in opposition to the FCCA's Motion to Compel Responses to its First Request for Production of Documents, Item No. 5. BellSouth has supplemented its response to Item No. 5, which supplemental response has been filed contemporaneously with this Motion. Accordingly, there is no need for further Commission action with respect to the foregoing discovery, and the FCCA's Motion to Compel, and in the Alternative, Motion to Strike, should be denied.

Respectfully submitted this 5th day of February 2004.



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