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LAW OFFICES
Messer, Caparello & Self
A Professional Association

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

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July 29, 2004

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. 031047-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of KMC Telecom III, LLC, KMC Telecom V, Inc., and KMC Data, LLC (collectively "KMC") are an original and fifteen copies of KMC's Objections to Staff's Second Set of Interrogatories 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.

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FRS/amb
Enclosures

Sincerely yours,



Floyd R. Self

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DOCUMENT NUMBER-DATE
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of Petition of KMC Telecom III)
LLC, KMC Telecom V, Inc., and KMC Data)
LLC For Arbitration of an Interconnection) Docket No. 031047-TP
Agreement with Sprint- Florida, Incorporated)
Pursuant to 47 U.S.C. Section 252(b) of the)
Communications Act of 1934, as Amended.)

**KMC TELECOM III LLC, KMC TELECOM V, INC., AND KMC DATA LLC's
OBJECTIONS TO STAFF'S SECOND SET OF INTERROGATORIES**

KMC Telecom III LLC, KMC Telecom V, Inc., and KMC Data LLC
(collectively, "KMC"), by and through their undersigned counsel, hereby submit their objections
to the Staff of the Florida Public Service Commission's ("Staff") Second Set of Interrogatories
(the "Interrogatories").

GENERAL OBJECTIONS

A. KMC objects to Staff's Interrogatories and all Instructions and Definitions associated with those Interrogatories to the extent they purport to impose obligations that are different from, or go beyond, the obligations imposed under Rules 1.280 and 1.340 of the Florida Rules of Civil Procedures, and the Commission's *Order Establishing Procedure*.

B. KMC objects to the Interrogatories and all Instructions and Definitions associated with those Interrogatories to the extent they seek information outside the scope of the issues raised in this arbitration proceeding, and to the extent their principal purpose appears to be to harass KMC and unnecessarily impose costs on KMC.

C. KMC objects to the Interrogatories and all Instructions and Definitions associated with those Interrogatories to the extent they seek documents or information protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privileges or doctrines. Any inadvertent disclosure of such privileged documents or information shall not be deemed to be a waiver of the attorney-client privilege, attorney work-product doctrine, or other applicable privileges or doctrines.

D. KMC objects to each Interrogatory to the extent that it is vague and ambiguous, particularly to the extent that it uses terms that are undefined or vaguely defined in the Interrogatory.

E. KMC objects to the Interrogatories and all Instructions and Definitions associated with those Interrogatories to the extent they seek confidential business, financial, or other proprietary documents or information. KMC further objects to the Interrogatories to the extent they seek documents or information protected by the privacy protections of the Florida or United States Constitution, or any other law, statute, or doctrine. Any confidential or proprietary documents KMC produces are produced subject to the terms of the Protective Order in this proceeding.

F. KMC objects to the Interrogatories to the extent they seek documents or information equally available to Staff through public sources or records, because such requests subject KMC to unreasonable and undue annoyance, oppression, burden, and expense.

G. The responses provided herein by KMC are not intended, and shall not in any way be construed, to constitute an admission or representation that responsive documents in fact do or do not exist, or that any such documents are relevant or admissible. KMC expressly reserves the right to rely, at any time, on subsequently discovered documents.

H. To the extent KMC responds to Staff's Interrogatories, KMC reserves the right to amend, replace, supersede, and/or supplement its responses as may become appropriate in the future.

I. KMC objects to the Interrogatories and all Instructions and Definitions associated with those Interrogatories to the extent that they seek to impose an obligation on KMC to respond on behalf of subsidiaries, affiliates, or other persons that are not subject to the jurisdiction of this Commission on the grounds that such discovery is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

J. KMC has interpreted the Interrogatories to apply to KMC's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any Interrogatories or any Instructions and Definitions associated with those Interrogatories are intended to apply to matters that take place outside the state of Florida and which are not related to Florida intrastate operations subject to the jurisdiction of this Commission, KMC objects to such Interrogatories as irrelevant, overly broad, unduly burdensome, and oppressive.

K. KMC objects to the Interrogatories to the extent they seek information that is not reasonably calculated to lead to the discovery of admissible evidence and not relevant to the subject matter of this arbitration proceeding.

L. KMC objects to the Interrogatories to the extent they are duplicative and overlapping, cumulative of one another, overly broad, and/or seek responses in a manner that is unduly burdensome, expensive, oppressive, or excessively time-consuming to KMC.

M. KMC is a large corporation with employees located in many different locations in Florida and with affiliates that have employees who are located in various states providing services on KMC's behalf. In the course of its business, KMC creates countless

documents that are not subject to retention of records requirements of the Commission or the Federal Communications Commission (“FCC”). These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or a KMC business is reorganized. Therefore, it is possible that not every document will be identified in response to Staff’s Interrogatories. KMC will conduct a reasonable and diligent search of those files that are reasonably expected to contain the requested information. To the extent that the Interrogatories or all Instructions and Definitions associated with those Interrogatories purport to require more, KMC objects on the grounds that compliance would impose an undue burden or expense on KMC.

N. KMC objects to the Interrogatories and all Instructions and Definitions associated with those Interrogatories to the extent they seek to obtain “all,” “each,” or “every” document, item, customer, or such other piece of information because such discovery is overly broad and unduly burdensome.

O. KMC objects to the Interrogatories and all Instructions and Definitions associated with those Interrogatories to the extent they seek to have KMC create documents not in existence at the time of the Interrogatories because such discovery is overly broad and unduly burdensome.

P. KMC objects to the Interrogatories and all Instructions and Definitions associated with those Interrogatories to the extent they are not limited to any stated period of time or a stated period of time that is longer than is relevant for purposes of the issues in this proceeding, as such discovery is overly broad and unduly burdensome.

Q. KMC objects to each and every Interrogatory that seeks information regarding KMC’s projections regarding future services, revenues, marketing strategies,

equipment deployments, or other such future business plans as such Interrogatories seek trade secrets and, for purposes of this proceeding, would be highly speculative and irrelevant to the issues involved in this proceeding.

R. KMC objects to the definition of “document” to the extent it seeks to impose an obligation that is greater than that imposed by Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, and the Commission’s *Order Establishing Procedure*, and to the extent that it would pose an unreasonable and undue annoyance, burden, and expense on KMC. KMC’s objection includes, but is not limited to, the definition of “document” to the extent it calls for the production of information which was not generated in the form of a written or printed record, on the grounds that it would be unduly burdensome and expensive to require KMC to search through computer records or other means of electronic or magnetic data storage or compilation.

OBJECTIONS

3. *For the purpose of the following questions, please refer to the direct testimony of KMC’s witness Gates, page 15, lines 12 through 14, which states that “from a theoretical perspective, routine modifications should be included in a forward-looking network and associated rates.”*

- a. What is the basis of this theory?*
- b. Does this theory hold that all routine modifications should be included in a forward-looking network and associated rates?*
- c. If the response to (b) is negative, what exceptions does this theory hold?*
- d. Does KMC believe that there is a difference between theoretical perspective and the actual application of the theory discussed in (a)?*
- e. If the response to (d) is affirmative, what would cause the difference?*

- f. What does KMC define as a routine modification?*
- g. What does KMC define as a modification that would not be routine?*
- h. What is the basis of the definitions provided in (f) and (g)?*
- i. Please describe what architecture, technology, and equipment KMC believes should be assumed in a forward-looking cost study model.*

OBJECTION: KMC incorporates its general objections as though more fully set forth herein. KMC further objects to this interrogatory on the grounds that the issue of routine network modifications has been resolved (*see* Rebuttal Testimony of Robert E. Collins, Jr. (July 9, 2004)) and, as a result, the issue is moot.

4. *In the forward-looking network, does KMC believe that the following would be included in the recurring rates:*

- a. the installation of pair gain equipment at the customer's premises? Please explain.*
- b. the installation of span repeaters? Please explain.*
- c. the installation of doublers? Please explain.*
- d. more than 3 rearrangements? Please explain.*
- e. modifications needed to allow the network to accept an older generation of technology? Please explain.*
- f. modifications that do not reflect Sprint's engineering standards? Please explain.*
- g. modifications that Sprint is not using now and going forward? Please explain.*
- h. modifications that are not economically efficient? Please explain.*
- i. modifications that do not include forward-looking technology? Please explain.*
- j. If the requested service could be provided using existing technology without a network modification, does KMC believe that the ILEC should be compensated for performing the requested network modification? Please explain.*

OBJECTION: KMC incorporates its general objections as though more fully set forth herein. KMC further objects to this interrogatory on the grounds that the issue of routine network modifications has been resolved (*see* Rebuttal Testimony of Robert E. Collins, Jr. (July 9, 2004)) and, as a result, the issue is moot.

5. *Please answer the following:*

a. *Does KMC believe that the cost to condition a loop by installing a facility other than that which Sprint would otherwise utilize in furnishing the requested service should be recovered by a non-recurring charge (NRC)? Please explain.*

b. *Does KMC believe that, in the case discussed in (a) above, KMC should compensate Sprint for the difference between what Sprint would otherwise utilize in furnishing the requested service and the cost of conditioning the loop per KMC's request? Please explain.*

c. *If response to (b) above is affirmative, should that difference be recovered through a NRC? Please explain.*

OBJECTION: KMC incorporates its general objections as though more fully set forth herein. KMC further objects to this interrogatory on the grounds that the issue of routine network modifications has been resolved (*see* Rebuttal Testimony of Robert E. Collins, Jr. (July 9, 2004)) and, as a result, the issue is moot. Moreover, "loop conditioning" is no longer an issue in this proceeding.

6. *Does KMC believe that if KMC is causing a cost, that they should incur that cost?*

OBJECTION: KMC incorporates its general objections as though more fully set forth herein. KMC further objects to this interrogatory because it is vague, ambiguous, overly broad and subject to multiple interpretations. The interrogatory fails to identify a specific service and/or circumstance under which a cost would be incurred and, thus, improperly requires KMC to speculate regarding the intent of, and the response contemplated by, the interrogatory. Furthermore, this interrogatory calls for a legal analysis rather than facts or factual information that could be used as evidence and, as such, the subject of this interrogatory is not the proper subject of discovery. Subject to and without waiving the foregoing objections, KMC will provide a response to this interrogatory.

7. *Does KMC believe that states have discretion to conclude whether any loop conditioning costs are not forward-looking costs?*

OBJECTION: KMC incorporates its general objections as though more fully set forth herein. Moreover, this interrogatory calls for a legal analysis rather than facts or factual information that could be used as evidence and, as such, the subject of this interrogatory is not the proper subject of discovery. KMC further objects to this interrogatory on the grounds that the issue of routine network modifications has been resolved (*see* Rebuttal Testimony of Robert

E. Collins, Jr. (July 9, 2004)) and, as a result, the issue is moot. Moreover, “loop conditioning” is no longer an issue in this proceeding.

8. Please answer the following:

a. Does KMC believe that paragraph 641 of the TRO allows for the recovery through a non-recurring charge for loop conditioning costs in extraordinary situations?

b. If response to (a) is affirmative, what would KMC describe as extraordinary situations?

OBJECTION: KMC incorporates its general objections as though more fully set forth herein. Moreover, this interrogatory calls for a legal analysis rather than facts or factual information that could be used as evidence and, as such, the subject of this interrogatory is not the proper subject of discovery. KMC also objects to this interrogatory because it is vague, ambiguous, overly broad and subject to multiple interpretations. The interrogatory either seeks representative examples of extraordinary situations, a general statement of the qualities of extraordinary situations, or an exhaustive list of extraordinary situations and, thus, improperly requires KMC to speculate regarding the intent of, and the response contemplated by, the interrogatory. KMC further objects to this interrogatory on the grounds that the issue of routine network modifications has been resolved (*see* Rebuttal Testimony of Robert E. Collins, Jr. (July 9, 2004)) and, as a result, the issue is moot. Finally, “loop conditioning” is no longer an issue in this proceeding.

9. *Paragraph 641 of the TRO lists the removal of loops that exceed 18,000 feet in length as an example of an extraordinary situation that may involve the recovery of costs for loop conditioning through non-recurring charges. Note 1945 to that paragraph states that today's network does not require voice-transmission enhancing devices on loops shorter than 18,000 feet.*

a. *Does KMC believe that the cost to remove a load coil on a loop exceeding 18,000 feet should be recovered through a NRC? Please explain.*

b. *Does KMC believe that the costs to condition a loop in a manner that it would need to be restored to its original condition to be of use by Sprint should be recovered through a NRC? Please explain.*

c. *Does KMC believe that the costs to condition a loop involving the placement of equipment for which Sprint would have no other requirement should be recovered through NRC? Please explain.*

OBJECTION: KMC incorporates its general objections as though more fully set forth herein. KMC further objects to this interrogatory on the grounds that the issue of routine network modifications has been resolved (see Rebuttal Testimony of Robert E. Collins, Jr. (July 9, 2004)) and, as a result, the issue is moot. Finally, "loop conditioning" is no longer an issue in this proceeding.

10. *If KMC requests services that require additional work to condition loops on Sprint's part that are not covered in the tariffed rates, does KMC believe that Sprint should recover those costs through a NRC? Please explain.*

OBJECTION: KMC incorporates its general objections as though more fully set forth herein. KMC further objects to this interrogatory on the grounds that the issue of routine network modifications has been resolved (*see* Rebuttal Testimony of Robert E. Collins, Jr. (July 9, 2004)) and, as a result, the issue is moot. Finally, “loop conditioning” is no longer an issue in this proceeding.

11. *Does KMC believe that Sprint should apply the same principles for determining when to charge KMC for making routine network modifications to provide access to unbundled loops and transport as Sprint does for charging its customers buying tariffed special access services? Please explain.*

OBJECTION: KMC incorporates its general objections as though more fully set forth herein. Moreover, this interrogatory calls for a legal analysis rather than facts or factual information that could be used as evidence and, as such, the subject of this interrogatory is not the proper subject of discovery. KMC further objects to this interrogatory on the grounds that the issue of routine network modifications has been resolved (*see* Rebuttal Testimony of Robert E. Collins, Jr. (July 9, 2004)) and, as a result, the issue is moot.

12. *For the purpose of the following questions, please refer to the direct testimony of KMC’s witness Collins, page 13, lines 9 through 16.*

a. *Can KMC access the spare capacity on pre-existing entrance facilities that had been previously deployed by another interconnector by cross-connecting its facilities to theirs? Please explain.*

OBJECTION: None. KMC will respond to this interrogatory.

b. Is co-carrier cross-connecting a technically feasible method of unbundled access? Please explain.

OBJECTION: None. KMC will respond to this interrogatory.

c. Would multiple cables and splices be required for KMC to access multiple co-carrier's entrance facilities using splicing in the common area vault as a method of access? Please explain.

OBJECTION: None. KMC will respond to this interrogatory.

d. If response to (c) is affirmative, would this be true for other carriers as well, provided nondiscriminatory access were available to all carriers?

OBJECTION: KMC incorporates its general objections as though more fully set forth herein. KMC further objects to this interrogatory because it is irrelevant and overly broad. The interrogatory seeks information about carriers that are not parties to this proceeding -- specifically, the methods by which these other carriers would access multiple co-carrier's entrance facilities -- and, thus, is beyond the scope of the proceeding. The interrogatory also fails to specify which carriers are to be considered for purposes of the hypothetical, thereby improperly requiring KMC to speculate regarding the intent of, and the response contemplated by, the interrogatory. Finally, KMC objects to this interrogatory because it seeks information that is not reasonably calculated to lead

to the discovery of admissible evidence and not relevant to the subject matter of this arbitration. Whether and the manner in which others would access other multiple carrier's entrance facilities is irrelevant to the issue in this arbitration proceeding, which pertains solely to KMC access to Sprint entrance facilities. Subject to and without waiving the foregoing objections, KMC will provide a response to this interrogatory.

e. If KMC were permitted to access the spare capacity on an existing interconnector's entrance facility by cabling and splicing in the common area vault, how would KMC access additional spare facilities in that cable should those facilities become available?

OBJECTION: None. KMC will respond to this interrogatory.

13. *In determining that splicing in the common area cable vault was a technically feasible method to access an existing interconnector's entrance facility, did KMC consider whether this method could result in*

a. multiple points of failure,

b. difficulty in fault isolation,

c. congestion in the common area cable vault,

d. damage to other facilities, or

e. network outages?

f. If answered affirmative to any of (a) through (e), please explain any conclusions reached as a result of those considerations.

g. If answered negative to any of (a) through (e), please explain why they were not considered and if they should have been considered.

OBJECTION: None. KMC will respond to this interrogatory.

14. *What criteria did KMC use in determining that it was technically feasible to access an existing interconnector's entrance facility via a splice in the common area vault?*

OBJECTION: None. KMC will provide a response to this interrogatory.

15. *What is the basis for KMC's belief that it is technically feasible to access an existing interconnector's entrance facility via a splice in the common area vault?*

OBJECTION: None. KMC will provide a response to this interrogatory.

16. *Does KMC believe that Sprint should have ultimate authority over assigning and configuring space within its premises, provided this authority is not used in an anti-competitive manner?*

OBJECTION: None. KMC will provide a response to this interrogatory.

Please answer the following interrogatory questions 17-20 based on the following scenarios:

Scenario 1- Access to spare facilities of existing interconnectors is achieved via co-carrier cross-connects.

Scenario 2- Access to spare facilities of existing interconnectors is achieved via a splice in the common area vault.

17. *Does Scenario 1, as a practical, economic, or operational matter, provide an equivalent quality interconnection as what can be achieved via using Scenario 2? Please explain.*

OBJECTION: KMC incorporates its general objections as though fully more fully set forth herein. KMC also objects to this interrogatory because it is vague, ambiguous, overly broad, and subject to multiple interpretations. The interrogatory is unclear, for example, whether the answer should address practical, economic, *and* operational considerations or whether only one of those areas should be addressed if in the affirmative.

18. *Does Scenario 1 provide nondiscriminatory access to the spare capacity of existing interconnectors facilities?*

OBJECTION: KMC incorporates its general objections as though fully more fully set forth herein. Moreover, this interrogatory calls for a legal analysis rather than facts or factual information that could be used as evidence and, as such, the subject of this interrogatory is not the proper subject of discovery. In addition, KMC also objects to this interrogatory because it is vague, ambiguous, overly broad, and subject to multiple interpretations. The interrogatory improperly requires KMC to speculate regarding the intent of, and the response contemplated by, the interrogatory. The two objects for the requested nondiscrimination analyses are not clearly stated in the interrogatory.

19. *Please state the advantages and disadvantages in deployment in Scenario 1 and Scenario 2 with respect to*

k. space,

l. resources,

m. safety,

- n. security,*
- o. risk,*
- p. cost,*
- q. time,*
- r. maintenance and repair, and*
- s. other.*

OBJECTION: KMC incorporates its general objections as though fully more fully set forth herein. KMC also objects to this interrogatory because it is vague, ambiguous, overly broad, and subject to multiple interpretations. The interrogatory improperly requires KMC to speculate regarding the intent of, and the response contemplated by, the interrogatory. The details of Scenarios 1 and 2 are not specific enough to allow a clear analysis although general conclusions may be drawn. Subject to and without waiving the foregoing objections, KMC will provide a response to this interrogatory.

20. *How does Scenario 2 compare functionally with the manner in which other carriers and end users using switched or non-switched services are served?*

OBJECTION: KMC incorporates its general objections as though fully more fully set forth herein. KMC also objects to this interrogatory because it is vague, ambiguous, overly broad, and subject to multiple interpretations. The interrogatory improperly requires KMC to speculate regarding the intent of, and the response contemplated by, the interrogatory because it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and not relevant to the subject matter of this arbitration proceeding. Further, the

identity of “other carriers and end users” is not clear and the circumstances under which they are served are not stated in the interrogatory and are unclear, as is use of the terms “switched” and “non-switched” services, which are overly inclusive and very broad so as to encompass many different types of service.

21. Please refer to Collins testimony, page 8, lines 19-21. Please explain in detail how BellSouth’s measures and standards are more advanced than the Sprint metrics.

OBJECTION: None. KMC will provide a response to this interrogatory.

22. Please refer to Collins testimony, page 9, lines 7-10. Please provide a listing of performance-related issues raised through carrier-to-carrier disputes and complaint processes.

OBJECTION: None. KMC will provide a response to this interrogatory.

23. Please refer to page 9, lines 11-13. Please explain what is meant by subjecting Sprint to remedies similar to those that apply to BellSouth, on a “pro-rata” basis.

OBJECTION: None. KMC will provide a response to this interrogatory.

24. Please refer to Collins testimony, page 10, lines 6-7. Please provide specific measures, standards, and remedies KMC proposes for the Commission to adopt.

OBJECTION: None. KMC will provide a response to this interrogatory.

25. *Has KMC, at any time, filed a complaint with the FPSC regarding Sprint's failure to comply with its wholesale performance measurement plan?*

OBJECTION: None. KMC will provide a response to this interrogatory.

26. *Please provide any performance measurement results that show Sprint's inability to meet its obligation to provide nondiscriminatory service to KMC.*

OBJECTION None. KMC will provide a response to this interrogatory.

27. *Please provide any audits of individual performance measurements requested by KMC.*

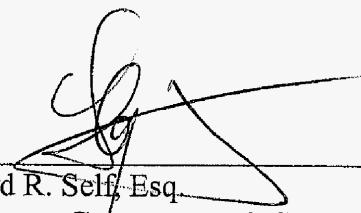
OBJECTION: None. KMC will provide a response to this interrogatory.

28. *Has KMC, at any time, filed comments in FPSC Docket No. 000121B-TP regarding performance measurements and enforcement mechanisms specific to Sprint?*

OBJECTION: None. KMC will respond to this interrogatory.

Respectfully submitted this 29th day of July, 2004.

By:



Floyd R. Self, Esq.
MESSER, CAPARELLO & SELF, P.A.
215 South Monroe Street, Suite 701
Tallahassee, Florida 32301
(850) 222-0720 (voice)
(850) 224-4359 (facsimile)
fself@lawfla.com

Edward A. Yorkgitis, Jr.
Enrico C. Soriano
Andrew M. Klein
Andrea Pruitt Edmonds
KELLEY DRYE & WARREN LLP
1200 19th Street, N.W., Fifth Floor
Washington, D.C. 20036
(202) 955-9600 (voice)
(202) 955-9792 (facsimile)
cyorkgitis@kelleydrye.com
esoriano@kelleydrye.com
aklein@kelleydrye.com
aedmonds@kelleydrye.com

Marva Brown Johnson
KMC Telecom Holdings, Inc.
1755 North Brown Road
Lawrenceville, GA 30043
(678) 985-6220 (voice)
(678) 985-6213 (facsimile)
marva.johnson@kmctelecom.com

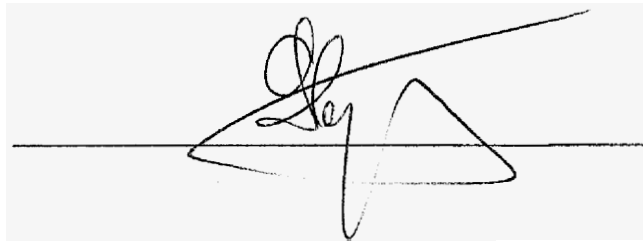
CERTIFICATE OF SERVICE

I, Floyd R. Self, do hereby certify that I have this 29th day of July 2004, served a copy of the foregoing **KMC TELECOM III LLC, KMC TELECOM V, INC., AND KMC DATA LLC'S OBJECTIONS TO SPRINT-FLORIDA, INCORPORATED'S SECOND SET OF INTERROGATORIES**, by first class U.S. mail, postage prepaid, upon the following individuals:

Lee Fordham, Esq.
General Counsel's Office, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Susan S. Masterton
P.O. Box 2214
Tallahassee, FL 32316-2214
Voice: 850-599-1560
Fax: 850-878-0777 (fax)
susan.masterton@mail.sprint.com

Janette Luehring, Esq.
Sprint
6450 Sprint Parkway
KSOPHN0212-2A511
Overland Park, KS 66251

A handwritten signature in black ink, appearing to read "Floyd R. Self", is written over a horizontal line. The signature is stylized and cursive.