

**ORIGINAL**

**Timolyn Henry**

**From:** Vicki Gordon Kaufman  
**Sent:** Thursday, December 02, 2004 4:06 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Dana Shaffer; James Meza; Jason Rojas  
**Subject:** Docket No. 041114-TP

Pursuant to the Commission's procedures for e-filing, XO Florida, Inc. provides the following information:

a. The attorney responsible for the filing is:

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b. The document is to be filed in Docket No. 041114-TP, Complaint of XO Florida, Inc. Against BellSouth Telecommunications, Inc. for Refusal to Convert Circuits to UNEs and for Expedited Processing.

c. The document is filed on behalf of XO.

d. The document is 3 pages long.

e. The document is XO's Response to BellSouth Telecommunications, Inc.'s Request for Clarification of Discovery Request.

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# ORIGINAL

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of XO Florida, Inc.  
Against BellSouth Telecommunications,  
Inc. for Refusal to Convert Circuits to  
UNEs and for Expedited Processing

Docket No. 041114-TP

Filed: December 2, 2004

### **XO FLORIDA, INC.'S RESPONSE TO BELLSOUTH TELECOMMUNICATIONS, INC.'S REQUEST FOR CLARIFICATION OF DISCOVERY REQUEST**

XO Florida, Inc. (XO), provides this clarification to BellSouth Telecommunications, Inc.'s (BellSouth) Request for Clarification of XO Interrogatory No. 5.

1. XO Interrogatory No. 5 states:

Provide and explain in detail Bell's proposed price for a "switch as is," or conversion without disconnection and reconnection of the circuit, for conversion of special access zero mileage loops to UNE loops, including an explanation of each charge and the basis for each charge.

2. BellSouth claims this interrogatory is "vague and ambiguous" because XO does not define what it means by "Bell's proposed price for a 'switch as is'".

3. XO's question is neither vague nor ambiguous. In fact, it is quite simple. XO is simply asking BellSouth to definitively state its proposed total price for the conversion of zero mile special access loops to UNE loops, without physical change to or disconnection of the loop. BellSouth currently has a "switch as is" rate for conversion of mileage special access loops to UNE EELs. XO simply seeks to discover what BellSouth's comparable proposed price for "switch as is" of zero mile special access loops to UNE loops is. The question also requests explanation of the charge, including

any and all components of the charge, or, in simplest terms, "what such charge(s) are for."

S/ Vicki Gordon Kaufman

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing XO Florida, Inc.'s Response to BellSouth Telecommunications, Inc.'s Request for Clarification of Discovery Request was served on the following by (\*) electronic mail and U.S. Mail this 2<sup>nd</sup> day of December 2004:

(\*) Jason Rojas  
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(\*) James Meza  
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S/Vicki Gordon Kaufman  
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