

ORIGINAL**Matilda Sanders**

From: Barclay, Lynn [Lynn.Barclay@BellSouth.com]
Sent: Tuesday, September 27, 2005 1:01 PM
To: Filings@psc.state.fl.us
Cc: Fatool, Vicki; Linda Hobbs; Nancy Sims; Holland, Robyn P; Bixler, Micheale; Slaughter, Brenda ; Mays, Meredith
Subject: 041269-TP BellSouth Bayó Letter regarding 1st Set of Interrogatories LecStar
Attachments: 041260 1st rogs to LecStar.pdf

<p>CMP _____ COM _____ CTR _____ ECR _____ GCL _____ OPC _____ RCA _____ SCR _____ SGA _____ SEC <u> 1 </u> OTH _____</p>	<p>A. Lynn Barclay Legal Secretary to Meredith Mays BellSouth Telecommunications, Inc. 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (404) 335-0788 lynn.barclay@bellsouth.com</p> <p>B. <u>Docket No. 041269-TL</u>: In re: Petition to Establish Generic Docket to Consider Amendments to Interconnection Agreements Resulting From Changes of Law</p> <p>C. BellSouth Telecommunications, Inc. on behalf of Meredith Mays</p> <p>D. 4 pages total</p> <p>E. BellSouth's Bayó letter regarding serving its First Set of Interrogatories to LecStar Telecom (Nos. 1-3).</p>
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Lynn Barclay

Legal Department
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ORIGINAL

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Meredith Mays
Senior Regulatory Counsel

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150 South Monroe Street
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Tallahassee, Florida 32301
(404) 335-0750

September 27, 2005

LecStar Telecom
Michael Britt
President and COO
2 Ravinia Drive, Suite 1300
Atlanta, GA 30346

Re: Docket No. 041269-TP

Dear Mr. Britt:

Enclosed is BellSouth Telecommunications, Inc.'s First Set of Interrogatories to LecStar Telecom, Inc. (Nos. 1-3), in the above referenced matter.

Sincerely,

Meredith Mays (SB)
Meredith Mays

603664

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:)	
)	Docket No. 041269-TP
Petition to Establish Generic Docket to)	
Consider Amendments to Interconnection)	
Agreements Resulting From Changes of Law)	Filed: September 27, 2005
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BellSouth's First Set of Interrogatories to LecStar Telecom, Inc.

BellSouth Telecommunications, Inc. ("BellSouth") hereby serves its First Set of Interrogatories on LecStar Telecom, Inc. (hereinafter "LecStar"). These requests are to be answered under oath and within the timeframe required pursuant to governing rules and applicable orders in this docket.

Definitions and Instructions

The following definitions and instructions shall apply to these data requests:

1. If you deny any request for admission set forth herein or any sub-part thereof, set forth with specificity the basis for your denial or partial denial.
2. The terms "LecStar" and "you," "your," "yours," and "your company" shall all mean the entity served with these data requests and all affiliates and subsidiaries, including, but not limited to carriers that you have merged with or acquired that still do business under a different name.
3. The term "fiber-based collocation" shall have the meaning set forth in paragraph 102 of the FCC's *Triennial Review Remand Order* and applicable FCC rules. As set forth therein, the term refers to a collocation arrangement, with active power supply, served by a non-ILEC fiber-optic cable entering the central office. The collocation arrangement may be obtained either pursuant to contract, tariff or, where

appropriate, section 251 of the 1996 Act. The term shall include fixed-wireless collocation arrangements at a wire center if the carrier's alternative transmission facilities both terminate in and leave the wire center.

INTERROGATORIES

1. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee wherein LecStar is a fiber-based collocator.
2. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee in which LecStar has an active collocation arrangement(s) and obtains fiber or fiber capacity from another entity that is not BellSouth, whether or not LecStar considers such arrangements to qualify as "fiber-based collocation" pursuant to the FCC's definition. Please describe with specificity the manner in which LecStar obtains fiber. If LecStar contends that it is not a fiber based collocator in any such wire center, please explain with specificity the basis for this contention.
3. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee in which LecStar has an active collocation arrangement(s) and obtains access to transport facilities from another entity that is not BellSouth, whether or not LecStar considers such facilities to qualify as "comparable transmission facilities" pursuant to the FCC's definition. Please describe with specificity the manner in which LecStar obtains such

facilities or transport and the quantity and bandwidth/capacity of such facilities, both activated and not currently activated. If LecStar contends that it is not a fiber based collocator in any such wire center, please explain with specificity the basis for this contention.

Respectfully submitted this 27th day of September, 2005.

Nancy White (YS)

NANCY B. WHITE
c/o Nancy H. Sims
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5558

Meredith Mays (JB)

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