

ATTACHMENT B

**BellSouth Telecommunications, Inc.
FPSC Docket No. 041269-TP
Request for Confidential Classification
Page 3 of 4
09/28/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF RESPONSES TO COVAD'S
FIRST INTERROGATORY, ITEM NO. 1 AND FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS, ITEM NO 1, FILED SEPTEMBER 28, 2005 IN
FLORIDA DOCKET NO. 041239-TP**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

DOCUMENT NUMBER-DATE

09246 SEP 28 '05

FPSC-COMMISSION CLERK

BellSouth Telecommunications, Inc.
FL Dkt. No. 041269-TP
Covad's 1st Request for Production
August 18, 2005
Item No. 1
Page 1 of 1

**ATTACHMENT TO
REQUEST FOR PRODUCTION,
ITEM NO. 1**

REDACTED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:)
)
Petition to Establish Generic Docket to) Docket No. 041269-TP
Consider Amendments to Interconnection)
Agreements Resulting From Changes of Law) Filed: August 8, 2005

Answer to BellSouth's First Requests for Admissions to Advanced Tel. Inc. d/b/a EATEL

NOW COMES, Advanced Tel, Inc. d/b/a EATEL, through undersigned counsel, who submits the following response to BellSouth's First Requests for Admission as set forth below:

1. Admit that you have fiber-based collocation arrangements at the follow BellSouth wire centers:

RESPONSE:

ADVANCED TEL, INC. D/B/A EATEL
913 SOUTH BURNSIDE AVENUE
GONZALES, LOUISIANA 70739
TELEPHONE: (225) 621-4498

BY: 

JANET S. BRITTON #23666
CORPORATE AND REGULATORY COUNSEL
ADVANCED TEL, INC. D/B/A EATEL
E-Mail: janet@eatel.com

RECEIVED
AUG 22 2005

U.S. MAIL-REG. RELATIONS
TALLAHASSEE, FL

COVAD1stPODNo1000002

BEFORE THE
NORTH CAROLINA UTILITIES COMMISSION

In the Matter of

Generic Proceeding to Consider Amendments)
To Interconnection Agreements Between)
BellSouth Telecommunications, Inc. and) Docket No. P-55, Sub 1549
Competing Local Providers Due to)
Change of Law)

**BELLSOUTH'S FIRST SET OF DATA REQUESTS TO GLOBAL CROSSING
LOCAL SERVICES, INC.**

RESPONSE OF GLOBAL CROSSING LOCAL SERVICES, INC.

Requests for Admission

1. Admit that you have fiber-based collocation arrangements at the following BellSouth wire centers:

RESPONSE:

I hereby certify that the foregoing response of Global Crossing Local Services, Inc. is true to the best of my knowledge, information and belief based upon review of company records.



Diane L. Peters

August 12, 2005

COVAD1stPODNo1000005

TRADE SECRET

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In re: §
§
GENERIC PROCEEDING TO EXAMINE ISSUES §
RELATED TO BELL SOUTH'S § Docket No. 19341-U
OBLIGATIONS TO PROVIDE UNBUNDLED §
NETWORK ELEMENTS §
§

XO COMMUNICATIONS SERVICES, INC.'S RESPONSES TO
BELL SOUTH TELECOMMUNICATIONS, INC.'S FIRST REQUESTS FOR ADMISSION

XO COMMUNICATIONS SERVICES, INC. ("XO") hereby respectfully submits the following responses to BellSouth Telecommunications, Inc.'s ("BellSouth") First Requests for Admission dated August 11, 2005.

Responses

1. Admit that you have fiber-based collocations at the following BellSouth wire centers:

RESPONSE:

COVAD1stPODNo1000006

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.

Requests for Admission

1. Admit that you have fiber-based collocation arrangements at the following

BellSouth wire centers:

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In re: §
§
GENERIC PROCEEDING TO EXAMINE ISSUES §
RELATED TO BELL SOUTH'S § Docket No. 19341-U
OBLIGATIONS TO PROVIDE UNBUNDLED §
NETWORK ELEMENTS §
§

**DIGITAL AGENT, LLC'S RESPONSES TO
BELL SOUTH TELECOMMUNICATIONS, INC.'S FIRST REQUESTS FOR ADMISSION**

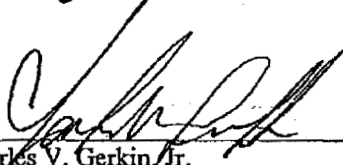
DIGITAL AGENT, LLC ("Digital Agent") hereby respectfully submits the following responses to BellSouth Telecommunications, Inc.'s ("BellSouth") First Requests for Admission dated August 12, 2005.

Responses

1. Admit that you have fiber-based collocations at the following BellSouth wire centers:

RESPONSE: _____

RESPECTFULLY SUBMITTED this 17 day of August, 2005.



Charles V. Gerkin, Jr.
Georgia State Bar No. 291625

FRIEND, HUDAK & HARRIS, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346
770-399-9500 (telephone)
770-234-5965 (facsimile)
Attorney for Digital Agent, LLC

COVAD1stPODNo1000010

both terminates at the collocation facility and leaves the wire center. 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.

Requests for Admission

1. Admit that you have fiber-based collocation arrangements at the following BellSouth wire centers:

Respectfully submitted, this 12th day of August 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

Lisa S. Foshee
LISA S. FOSHEE *msd*

JOHN T. TYLER
1025 Lenox Park Boulevard
Suite 6C01
Atlanta, Georgia 30319-5309
(404) 986-1718

R. DOUGLAS LACKEY
ANDREW D. SHORE
MEREDITH E. MAYS
BellSouth Center - Suite 4300
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375
(404) 335-0747

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:)
Generic Proceeding to Examine Issues) Docket No. 19341-U
Related to BellSouth's Obligations to)
Provide Unbundled Network Elements)
_____)

USCarrier Telecom LLC's Response to BellSouth Telecommunication Inc.'s First Requests
for Admission

USCarrier Telecom LLC ("USCarrier") hereby responds to BellSouth
Telecommunication Inc.'s ("BellSouth") first request for admission.

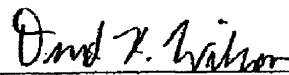
Response to Request for Admission

1. Admit that you have fiber-based collocation arrangements at the following
BellSouth wire center:

<REDACTED BY BELLSOUTH>

Response:

Respectfully submitted this 18th day of August, 2005.




David K. Wilson
Attorney for USCarrier Telecom LLC
Georgia State Bar No. 767778
Troutman Sanders LLP
600 Peachtree Street, N.E.
Suite 5200
Atlanta, GA 30308

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.

Requests for Admission

1. Admit that you have fiber-based collocation arrangements at the following BellSouth wire centers:

Respectfully submitted this 11th day of August, 2005.


LISA S. FOSHEE (B/S)
JOHN T. TYLER
1025 Lenox Park Boulevard
Suite 6C01
Atlanta, Georgia 30319-5309
(404) 986-1718

R. DOUGLAS LACKEY
ANDREW D. SHORE
MEREDITH MAYS
675 W. Peachtree Street, Suite 4300
Atlanta, GA 303075
(404) 335-0765

CONFIDENTIAL

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

FILED

AUG 19 2005

*Clerk's Office
N.C. Utilities Commission*

In the Matter of)
Proceeding to Consider Amendments to)
Interconnection Agreements Between) P-55, Sub 1549
BellSouth Telecommunications, Inc. and)
Competing Local Providers Due to Changes)
of Law)

**RESPONSES OF TIME WARNER TELECOM OF NORTH CAROLINA, L.P.
TO BELLSOUTH'S FIRST SET OF DATA REQUESTS**

Time Warner Telecom of North Carolina, L.P. ("TWTC"), hereby provides the following responses to BellSouth's First Set of Data Requests dated August 8, 2005, in the above-referenced proceeding.

Objections

TWTC objects to the First Set of Data Requests to the extent that they seek to impose obligations on TWTC, which is a Non-Participating Party in this proceeding.

TWTC further objects to BellSouth's instructions insofar as BellSouth's definition of "fiber-based collocation" would require TWTC to make legal judgments concerning the application of the definition to the factual information sought.

Without waiving the foregoing objections, TWTC provides the responses set forth below.

Requests for Admission

1. Admit that you have fiber-based collocation arrangements at the following BellSouth wire centers.





John Sullivan
Vice President & Chief Counsel/Telephony

1500 Market Street
Philadelphia, PA. 19102
Tele: (215) 320-8816
Fax: (215) 981-8508

August 22, 2005

RECEIVED

AUG 23 2005

U.S. MAIL-REG. RELATIONS
TALLAHASSEE, FL

Via Overnight Mail

Andrew D. Shore, Sen. Reg. Counsel
BellSouth
150 South Monroe St.
Tallahassee, FL 32301

Re: Petition To Establish Generic Docket To Consider Amendments To Interconnection Agreements Resulting From Changes In Law, By Bellsouth Telecommunications, Inc.; Dkt. No. 041269-TP

Dear Mr. Shore:

This letter is furnished on behalf of Comcast Phone of Florida, LLC ("Comcast Phone"), a competitive local exchange company, in response to the First Request for Admission ("RFA") of BellSouth Telecommunications, Inc. ("BST") dated August 8, 2005.

Comcast Phone is not a party to the above-referenced docket. Nevertheless, Comcast Phone, without waiving its right to object to future RFAs, other data requests, or to participation in this proceeding, provides the following response to BST's RFA #1 ["Admit that you have fiber-based collocation arrangements at the following BellSouth wire centers

Finally, Comcast Phone requests that you please update the Comcast contacts identified in your August 8th letter, with my information above and below. If you have any questions, please do not hesitate to contact me.

Sincerely,

John G. Sullivan
VP & Chief Counsel - Telephony
Comcast Phone

cc: Commissioner Lisa Polak Edgar, FPSC, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850

COVAD1stPODNo1000025

**BEFORE THE
NORTH CAROLINA UTILITIES COMMISSION**

In the Matter of)	
)	
Generic Proceeding to Consider Amendments)	Docket No. P-55, Sub 1549
To Interconnection Agreements Between)	
BellSouth Telecommunications, Inc. and)	
Competing Local Providers Due to)	
Change of Law)	

MCi'S RESPONSE TO BELL SOUTH'S FIRST DATA REQUESTS

MCImetro Access Transmission Services, LLC ("MCI") responds to the First Data Requests of BellSouth Telecommunications, Inc. ("BellSouth") as follows:

FIRST SET OF DATA REQUESTS

1. Admit that you have fiber-based collocation arrangements at the following BellSouth wire centers:

RESPONSE:

BEFORE THE

NORTH CAROLINA UTILITIES COMMISSION

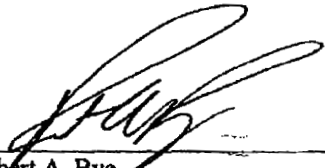
In the Matter of)
)
Generic Proceeding to Consider Amendments) Docket No. P-55, Sub 1549
To Interconnection Agreements Between)
BellSouth Telecommunications, Inc. and)
Competing Local Providers Due to)
Change of Law)

**RESPONSE OF CINERGY COMMUNICATIONS COMPANY
TO BELLSOUTH'S FIRST SET OF DATA REQUESTS
TO CINERGY COMMUNICATIONS, INC. (SIC)**

COMES NOW, Cinergy Communications Company, by and through counsel and hereby provides the following Response of Cinergy Communications Company to BellSouth's First Set of Data Requests to Cinergy Communications, Inc. (SIC).

1. Admit that you have fiber-based collocation arrangements at the following BellSouth wire centers:

This 23rd day of August, 2005.



Robert A. Bye
V.P. and General Counsel
Cinergy Communications Company
8829 Bond St.
Overland Park, KS 66214
(913) 754-3333
(812) 759-1732 Facsimile

COVAD1stPODNo1000029

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:)
)
Petition to Establish Generic Docket to) **Docket No. 041269-TP**
Consider Amendments to Interconnection) **Filed:**
Agreements Resulting From Changes of Law)
_____)

American Fiber Systems, Inc.'s Response to BellSouth's
First Requests for Admission

NOW COMES, American Fiber Systems, Inc. ("AFS") who hereby submits its Response to BellSouth's First Requests for Admission in the above-referenced Docket.

Request for Admission #1:

Admit that you have fiber-based collocation arrangements at the following BellSouth wire centers:

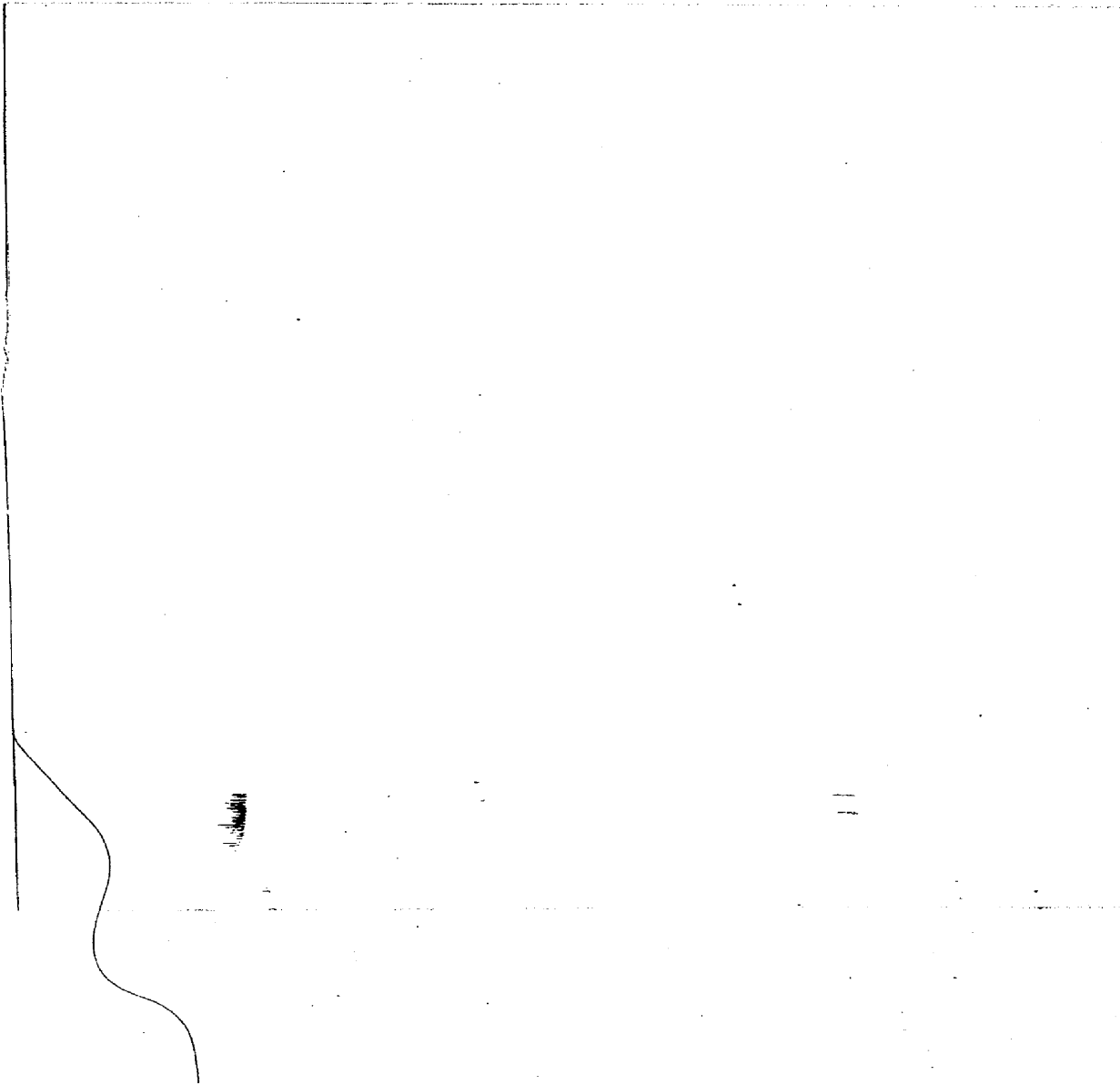
Response :

ITC^DELTA COM/BTI
CONFIDENTIAL ATTACHMENT A
DOCKET NO. P-55, SUB 1549

ITC^DeltaCom/BTI RESPONSE TO REQUEST FOR ADMISSION NO. 1

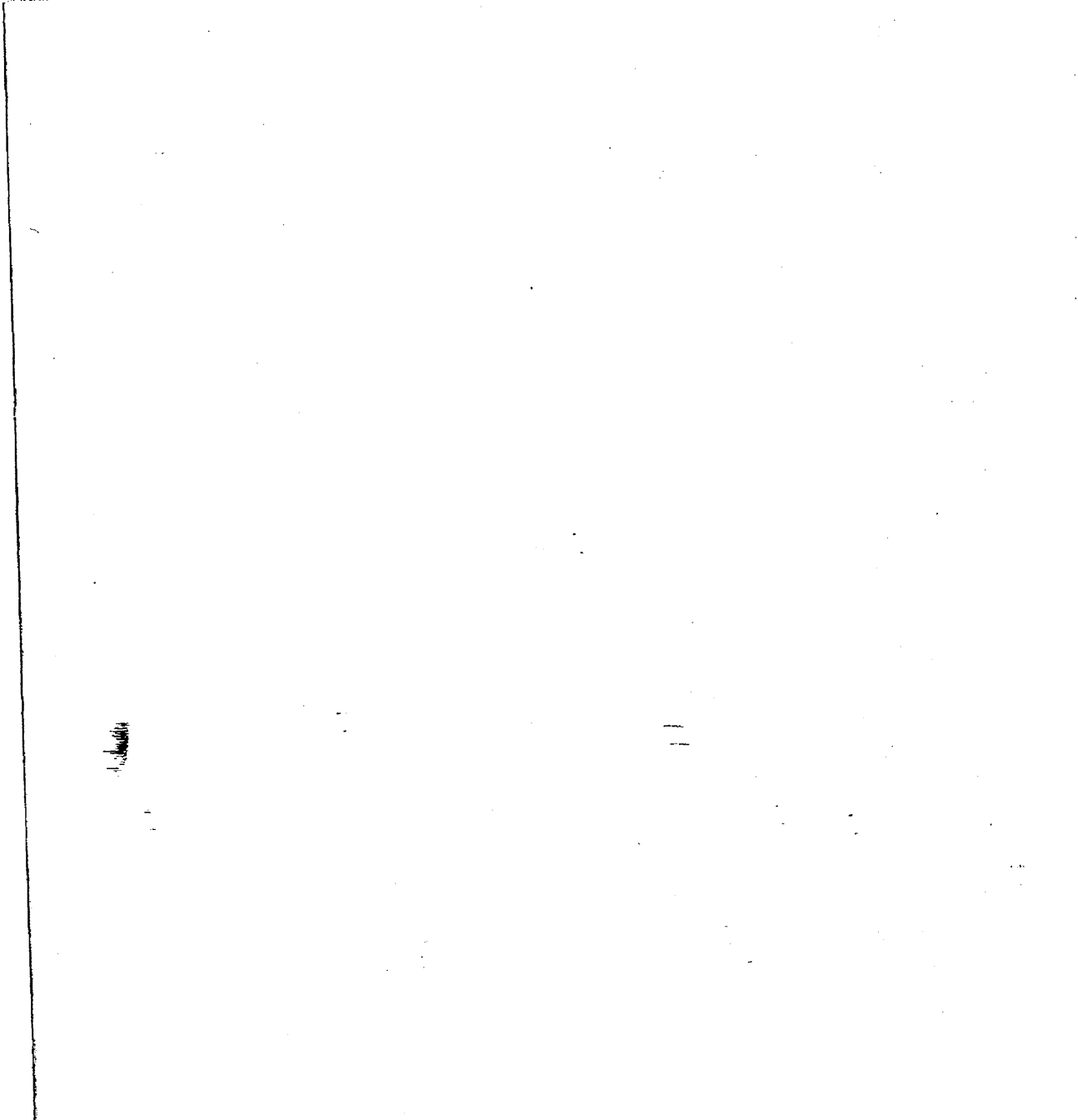
**ITC^DELTA COM/BTI
CONFIDENTIAL ATTACHMENT A
DOCKET NO. P-55, SUB 1549**

ITC^DeltaCom/BTI RESPONSE TO REQUEST FOR ADMISSION NO. 1



**ITC^DELTA COM/BTI
CONFIDENTIAL ATTACHMENT A
DOCKET NO. P-55, SUB 1549**

ITC^DeltaCom/BTI RESPONSE TO REQUEST FOR ADMISSION NO. 1



COVAD1stPODNo1000046

**ITC^DELTA COM/BTI
CONFIDENTIAL ATTACHMENT A
DOCKET NO. P-55, SUB 1549**

ITC^DeltaCom/BTI RESPONSE TO REQUEST FOR ADMISSION NO. 1

**BEFORE THE
NORTH CAROLINA UTILITIES COMMISSION**

In the Matter of)
)
Generic Proceeding to Consider Amendments) Docket No. P-55, Sub 1549
To Interconnection Agreements Between)
BellSouth Telecommunications, Inc. and)
Competing Local Providers Due to)
Change of Law)

**NETWORK TELEPHONE CORPORATION'S RESPONSE
TO BELLSOUTH'S FIRST DATA REQUESTS**

Network Telephone Corporation ("Network Telephone") responds to the First Data Requests of BellSouth Telecommunications, Inc. ("BellSouth") as follows:

FIRST SET OF DATA REQUESTS

1. Admit that you have fiber-based collocation arrangements at the following BellSouth wire centers:

RESPONSE:

August _____, 2005.

Ralph McDonald
Attorney for MCI
BAILEY & DIXON, L.L.P.
Post Office Box 1351
Raleigh, North Carolina 27602-1351
Telephone: (919) 828-0731

COVAD1stPODNo100054

FDN Communications
FPSC Dkt No. 041269-TP
BellSouth's 1st Admissions
August 24, 2005

APPENDIX ADM-1 to BellSouth First Request for Admission

PROPRIETARY/CONFIDENTIAL

COVAD1stPODNo1000067

Docket No. 041269-TP

In re: Petition to Establish Generic Docket to Consider Amendments to Interconnection Agreements Resulting from Change of Law

**Harbor Communications, LLC's Response to
BellSouth Telecommunications First Request for Admissions**

Harbor Communications, LLC hereby submits its response to BellSouth's First Requests for Admission served August 8, 2005.

Request for Admission No. 1

Admit that you have fiber-based collocation arrangements at the following BellSouth wire centers:

Response

Response provided by: Ed Forbess, Director of External Operations

COVAD1stPODNo1000069

State of North Carolina
Utilities Commission
Raleigh

In the Matter of)
)
Generic Proceeding to Consider Amendments) Docket No. P-55, Sub 1549
To Interconnection Agreements Between)
BellSouth Telecommunications, Inc. and)
Competing Local Providers Due to)
Change of Law)

**CTC EXCHANGE SERVICES, INC.'S RESPONSES TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST SET OF DATA REQUESTS**

Pursuant to the Procedural Order Setting Out Issues, Establishing Discovery Procedures, and Setting Forth Protective Order issued July 8, 2005 by the North Carolina Utilities Commission ("Commission"), the Rules and Regulations of the North Carolina Utilities Commission, and the North Carolina Rules of Civil Procedure, CTC Exchange Services, Inc. ("CTCES") hereby responds to BellSouth Telecommunications, Inc.'s August 8, 2005 Request for Admissions and Interrogatories and Requests for Production of Documents in the above-captioned matter, as follows.

CTCES' RESPONSES TO ADMISSIONS

1. Admit that you have fiber-based collocation arrangements at the following

BellSouth wire centers:

RESPONSE:

Subject to the foregoing objections, ACI responds to BellSouth's First Data Request as follows:

1. Admit that you have fiber-based collocation arrangements at the following BellSouth wire centers:

RESPONSE:

This the 31st day of August, 2005.

BURNS, DAY & PRESNELL, P.A.

By: 

Daniel C. Higgins
Post Office Box 10867
Raleigh, NC 27605
Tel: (919) 782-1441

COVAD1stPODNo1000082

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

Requests for Admission

1. Admit that you have fiber-based collocation arrangements at the following

BellSouth wire centers:

--

Respectfully submitted this 8th day of August, 2005.

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

R. DOUGLAS LACKEY
ANDREW D. SHORE
MEREDITH MAYS
675 W. Peachtree Street, Suite 4300
Atlanta, GA 303075
(404) 335-0765

<u>Wire Center</u>	<u>Total HDSL UNE Loops</u>	<u>State</u>
		NC
		TN
		GA
		SC
		FL
		FL
		FL
		SC
		GA
		FL
		FL
		LA
		FL
		TN
		GA
		AL
		NC
		GA
		FL
		AL
		NC
		TN
		FL
		TN
		FL
		NC
		SC
		AL
		FL
		GA
		NC
		SC
		TN
		NC
		LA
		TN

<u>Wire Center</u>	<u>Total HDSL UNE Loops</u>	<u>State</u>
		FL
		TN
		NC
		TN
		SC
		FL
		NC
		AL
		KY
		LA
		GA
		NC
		FL
		SC
		LA
		GA
		SC
		GA
		AL
		NC
		FL
		GA
		FL
		GA
		LA
		FL
		FL
		FL
		NC
		GA
		FL
		SC
		TN
		GA
		MS
		GA

<u>Wire Center</u>	<u>Total HDSL UNE Loops</u>	<u>State</u>
		FL
		FL
		FL
		FL
		FL
		FL
		LA
		LA
		GA
		FL
		GA
		GA
		GA
		SC
		FL
		FL
		FL
		FL
		FL
		FL
		FL
		TN
		FL
		FL
		FL
		FL
		GA
		NC
		FL
		SC
		GA
		FL
		FL
		FL
		AL
		FL

<u>Wire Center</u>	<u>Total HDSL UNE Loops</u>	<u>State</u>
		FL
		LA
		KY
		FL
		FL
		FL
		FL
		FL
		FL
		TN
		TN
		TN
		LA
		TN
		TN
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		GA
		NC
		NC
		LA
		LA
		LA
		LA
		NC
		LA
		FL
		GA
		FL