

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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COMMISSION
CLERK

In re: Petition to Establish Generic)
Docket to Consider Amendments to)
Interconnection Agreements Resulting)
From Changes of Law)

Docket No. 041269-1
Filed September 30, 2005

**ITCDELTA COM'S NOTICE OF SERVICE OF RESPONSES TO
STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-4)**

ITC^DeltaCom Communications, Inc. ("ITC^DeltaCom"), by and through its undersigned counsel, files notice that it has served its Responses to Staff's First Set of Interrogatories (Nos. 1-4) by e-mail transmission and U.S. Mail to: Adam Teitzman and Kira Scott, Staff Counsel, Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850, with a copy to all counsel on the attached Certificate of Service, on this 30th day of September, 2005.

- MP _____
- OM _____
- TR _____
- CR _____
- CL _____
- PC _____
- CA _____
- DR _____
- SA _____
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- TH _____

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Respectfully submitted,



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RESPONSE OF ITC^DELTACOM TO STAFF'S FIRST SET OF INTERROGATORIES

- For the purpose of this Interrogatory, populate the following table with issue-specific references from the Direct Testimony and Exhibits of Jerry Watts. For the purpose of this Interrogatory, "Issue Number" refers to those set forth in Order PSC-05-0736-PCO-TP, issued July 11, 2005, in Docket No. 041269-TP, the Order Establishing Procedure. Respondent may expand table by adding rows as necessary.

ISSUE and TESTIMONY MATRIX (Watts)	
<u>Issue Number(s)</u>	<u>Issue-Specific Direct Testimony or Exhibit reference (page: line)</u>
30	Direct Testimony, page 13 and corrected exhibit JW-1

Response:

ITC^DeltaCom will withdraw or redact the prefiled testimony of Mr. Watts except for issue 30 pursuant to an agreement reached with BellSouth.

- For the purpose of this Interrogatory, populate the following table with issue-specific references from the Direct Testimony and Exhibits of Steven Brownworth. For the purpose of this Interrogatory, "Issue Number" refers to those set forth in Order PSC-05-0736-PCO-TP, issued July 11, 2005, in Docket No. 041269-TP, the Order Establishing Procedure. Respondent may expand table by adding rows as necessary.

ISSUE and TESTIMONY MATRIX (Brownworth)	
<u>Issue Number(s)</u>	<u>Issue-Specific Direct Testimony or Exhibit reference (page: line)</u>

Response:

ITC^DeltaCom will withdraw the prefiled testimony of Mr. Brownworth pursuant to an agreement reached with BellSouth.

3. For the purpose of this Interrogatory, populate the following table with issue-specific references from the Direct Testimony and Exhibits of Mary Conquest. For the purpose of this Interrogatory, "Issue Number" refers to those set forth in Order PSC-05-0736-PCO-TP, issued July 11, 2005, in Docket No. 041269-TP, the Order Establishing Procedure. Respondent may expand table by adding rows as necessary.

ISSUE and TESTIMONY MATRIX (Conquest)	
Issue Number(s)	Issue-Specific Direct Testimony or Exhibit reference (page: line)

Response:

ITC^DeltaCom will withdraw the prefiled testimony of Ms. Conquest pursuant to an agreement reached with BellSouth.

4. In the direct testimony of BellSouth witness Kathy K. Blake at page 4, lines 16-17, she states that "CLECs have acknowledged that there is no dispute concerning these issues [referring to Issues 6 and 20]." Please answer the following:
- a) Does ITC DeltaCom agree that Issue 6 is no longer in dispute? Please explain your answer.
 - b) Does ITC DeltaCom agree that Issue 20 is no longer in dispute? Please explain your answer.

RESPONSE:

ITC^DeltaCom agrees that it is no longer contesting these two issues (6 and 20).

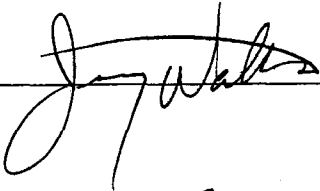
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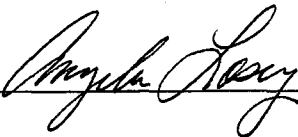
STATE OF ALABAMA)

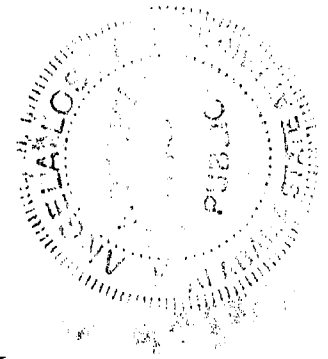
COUNTY OF MADISON)

I hereby certify that on this 25TH day of September, 2005, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Jerry Watts, who is personally known to me, and he/she acknowledged before me that he/she provided the answers to interrogatory number(s) 1-4 from STAFF'S FIRST SET OF INTERROGATORIES TO ITC DELTACOM (NOS. 1 - 4) in Docket No. 041269-TP, and that the responses are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 29 day of September, 2005.







Notary Public
State of Alabama, at Large

My Commission Expires:

1-12-08

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been served by e-mail transmission and/or by U.S. mail, upon the following this 30th day of September, 2005:

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