

CONFIDENTIAL

REDACTED

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

PROPRIETARY

DOCUMENT NUMBER - DATE

10336 OCT 24 05

FPSC-COMMISSION CLERK

CONFIDENTIAL

-----Original Message-----

From: Mays, Meredith
Sent: Thursday, September 08, 2005 1:02 PM
To: 'dhiggins@bdppa.com'
Subject: Alltel Discovery response

Daniel,

FINNS
BellSouth is in receipt of Alltel's confidential discovery responses in NC docket P-55, Sub 1549. We would appreciate having the opportunity to speak with the appropriate person at Alltel to understand with more specificity [REDACTED] Could you please forward this email or otherwise contact me so that we can do so?

Meredith Mays
404-335-0750

CONFIDENTIAL

-----Original Message-----

From: Mays, Meredith
Sent: Thursday, September 08, 2005 2:44 PM
To: 'Daniel Higgins'
Subject: RE: Alltel Discovery response

-----Original Message-----

From: Daniel Higgins [<mailto:dhiggins@bdppa.com>]
Sent: Thursday, September 08, 2005 2:27 PM
To: Mays, Meredith
Subject: Re: Alltel Discovery response

What aspect of ACI's response is it that you wish to discuss?

>>> "Mays, Meredith" <Meredith.Mays@BellSouth.COM> 09/08/05 01:02PM >>>
Daniel,

BellSouth is in receipt of Alltel's confidential discovery responses in NC docket P-55, Sub 1549. We would appreciate having the opportunity to speak with the appropriate person at Alltel to understand with more specificity [REDACTED] Could you please forward this email or otherwise contact me so that we can do so?

Meredith Mays
404-335-0750

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers. 163

CONFIDENTIAL

CONFIDENTIAL

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)	

REVISED
CONFIDENTIAL RESPONSE OF ALLTEL COMMUNICATIONS, INC. TO
BELLSOUTH'S FIRST SET OF DATA REQUESTS

General Objections to BellSouth's Interrogatories and Document Requests

1. ALLTEL Communications, Inc. ("ACI") objects to BellSouth's service of Data Requests on ALLTEL in this docket on the ground that ACI has given no notice of active participation in this docket in accordance with the Commission's Procedural Order or otherwise, and it accordingly should not be subjected to the burden of participating in this docket or providing the discovery now sought by BellSouth.

2. ACI objects to BellSouth's Data Requests to the extent they request production of information and/or documents that is proprietary and confidential. This information, if disclosed publicly, would provide a marketing advantage to companies which compete directly with ACI.

ACI's response to this BellSouth discovery contains confidential information constituting trade secrets that should be exempt from public disclosure pursuant to N.C.G.S. § 132-1.2, and is not to be disclosed to any third party by BellSouth without the prior written consent of ACI.

**THIS RESPONSE IS CONFIDENTIAL AND IS FILED WITH THE
NORTH CAROLINA UTILITIES COMMISSION UNDER SEAL.**

CONFIDENTIAL

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

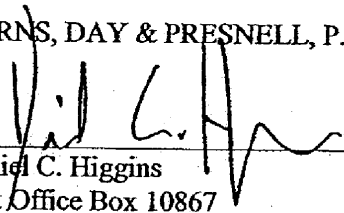
1. Admit that you have fiber-based collocation arrangements at the following BellSouth wire centers:

RESPONSE:

This the 16th day of September, 2005.

BURNS, DAY & PRESNELL, P.A.

By:


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

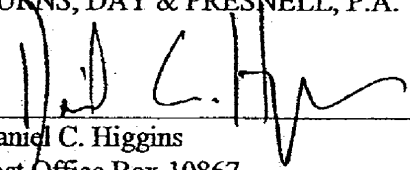
CONFIDENTIAL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by placing a copy of same in the U.S. mail, first class postage prepaid, addressed as shown below, this the 16th day of September, 2005.

BURNS, DAY & PRESNELL, P.A.

By:


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

SERVED ON:

Edward L. Rankin, III
P.O. Box 30188
Charlotte, NC 28230

CONFIDENTIAL

T. John Policastro, Attorney at Law

Post Office Box 97713
Raleigh, North Carolina 27624-7713
919-334-3693 • 832-213-0849 facsimile
jpolicastro@nc.rr.com

September 12, 2005

VIA HAND DELIVERY

Ms. Geneva Thigpen, Chief Clerk
North Carolina Utilities Commission
Dobbs Building, Room 5063
430 North Salisbury Street
Raleigh, NC 27611

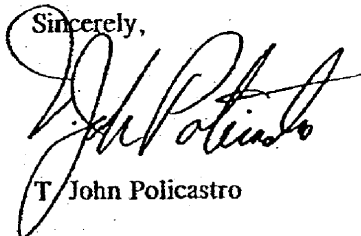
**Re: In the Matter of Proceeding to Consider Amendments to Interconnection
Agreements Between BellSouth Telecommunications, Inc. and Competing Local
Providers Due to Changes of Law
Docket No. P-55, SUB 1549**

Dear Ms. Thigpen:

Attached please find the original and thirty (30) copies of the *Response of AT&T Communications of the Southern States, LLC to BellSouth's First Data Request* in the above referenced docket. The attached contains proprietary information and is being filed as confidential.

Please contact me at 919-334-3693 with any questions. Thank you.

Sincerely,



T. John Policastro

CONFIDENTIAL

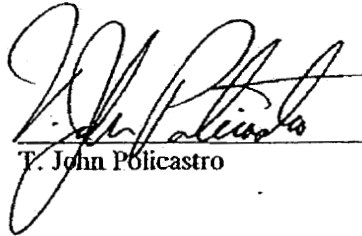
CVD1stSuppPODNo1000095

CONFIDENTIAL

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing *Response of AT&T Communications of the Southern States, LLC to BellSouth's First Data Request* was served on the following parties via electronic mail this 12th day of September, 2005.

Edward L. Rankin, III
General Counsel – North Carolina
BellSouth Telecommunications, Inc.
Post Office Box 30188
Charlotte, North Carolina 28230
edward.rankin@bellsouth.com



T. John Policastro

CONFIDENTIAL

CVD1stSuppPODNo1000096

CONFIDENTIAL

AT&T's Response to BellSouth's First Set of Data Request
September 9, 2005

PROPRIETARY AND CONFIDENTIAL

CONFIDENTIAL

CVD1stSuppPODNo1000097

CONFIDENTIAL

AT&T's Response to BellSouth's First Set of Data Request
September 9, 2005

PROPRIETARY AND CONFIDENTIAL

CONFIDENTIAL

CVD1stSuppPODNo1000098

CONFIDENTIAL

-----Original Message-----

From: Lackey, Douglas
Sent: Thursday, September 15, 2005 11:00 AM
To: 'Henry, Michael J - LGCRP'
Cc: Mays, Meredith
Subject: Requests for Admission

Mickey, I need your help please. I know you have tried to avoid the change of law proceedings like the plague, but an issue has come up with AT&T that needs some work.

We basically took all of the offices where we thought that there were fiber-based powered-up collocators, and we sent requests for admission to each of the collocated CLECs. We basically asked them to admit that they were collocated in the office, that they had fiber from someone other than BellSouth, and that they had power.

Once of the CLECs was obviously AT&T.

I have AT&T's response which was filed in NC and sent to us by John Policastro.

1
2
3

I can send you a copy of the answer if you need, but obviously John has it. I would appreciate any help you could give us.

Doug

CONFIDENTIAL

From: Daniels,Sonia C - LGCRP [mailto:soniadaniels@att.com]
Sent: Monday, September 26, 2005 4:43 PM
To: Rankin, Edward; Lackey, Douglas; Blache, Dorothy
Cc: Henry,Michael J - LGCRP; Eppsteiner,David M - LGCRP; T. John Policastro
Subject: RE: P55 Sub 1549 - AT&T Response to BellSouth's Data Request

Attached is AT&T's Supplemental Response to BellSouth's Request for Admission in the above referenced docket.

<<Supplemental Response ATT- BST Collos.xls>>

Sonia Daniels
Docket Manager
AT&T Law & Gov't Affairs
1230 Peachtree
4th Floor
Atlanta, GA 30309
Phone: 404-810-8488
Fax: 281-664-9791

From: Daniels,Sonia C - LGCRP
Sent: Friday, September 09, 2005 12:02 PM
To: 'Dorothy.Blache@BellSouth.COM'; 'edward.rankin@bellsouth.com'
Cc: Henry,Michael J - LGCRP; Eppsteiner,David M - LGCRP; 'T. John Policastro'
Subject: P55 Sub 1549 - AT&T Response to BellSouth's Data Request

Attached please find AT&T's Confidential Response to BellSouth's First Data Request in the above referenced docket.

<< File: NC-Docket No. P-55, Sub 1549.pdf >>

Sonia Daniels
Docket Manager
AT&T Law & Gov't Affairs
1230 Peachtree
4th Floor
Atlanta, GA 30309
Phone: 404-810-8488
Fax: 281-664-9791

CONFIDENTIAL

**AT&T's Supplemental Response to BellSouth's First Set of Data Request
September 27, 2005**

PROPRIETARY AND CONFIDENTIAL

CVD1stSuppPODNo1000101

CONFIDENTIAL

**AT&T's Supplemental Response to BellSouth's First Set of Data Request
September 27, 2005**

PROPRIETARY AND CONFIDENTIAL

CVD1stSuppPODNo1000102

CONFIDENTIAL

-----Original Message-----

From: Mulvany, Rose [mailto:RMulvany@birch.com]
Sent: Wednesday, September 28, 2005 5:22 PM
To: Mays, Meredith
Cc: Dillard, Nancy
Subject: BellSouth's 1st Set of Interrogatories -- FL
Importance: High

Meredith:

I am in receipt of BellSouth's 1st set of interrogatories for the Florida Change of Law proceeding. While I am happy to respond to these requests, I just wanted to let you know up front that Birch

If you still need us to officially respond to these interrogatories, please let me know via a return e-mail. If you find the above information sufficient and negate the need for a response, please let me know that via a return e-mail.

Thanks for your time.

Rose

Rose Mulvany Henry
Vice President of Regulatory Affairs
Birch Telecom, Inc.
2300 Main Street, Suite 600
Kansas City, MO 64108
816-300-3731 (voice)
816-300-3350 (fax)
rmulvany@birch.com

CONFIDENTIAL

-----Original Message-----

From: Mays, Meredith
Sent: Thursday, September 29, 2005 9:52 AM
To: 'Mulvany, Rose'
Subject: RE: BellSouth's 1st Set of Interrogatories -- FL

Rose, we will consider your email below as a sufficient response.

Thank you.

-----Original Message-----

From: Mulvany, Rose [mailto:RMulvany@birch.com]
Sent: Wednesday, September 28, 2005 5:22 PM
To: Mays, Meredith
Cc: Dillard, Nancy
Subject: BellSouth's 1st Set of Interrogatories -- FL
Importance: High

Meredith:

I am in receipt of BellSouth's 1st set of interrogatories for the Florida Change of Law proceeding. While I am happy to respond to these requests, I just wanted to let you know up front that Birch

If you still need us to officially respond to these interrogatories, please let me know via a return e-mail. If you find the above information sufficient and negate the need for a response, please let me know that via a return e-mail.

Thanks for your time.

Rose

Rose Mulvany Henry
Vice President of Regulatory Affairs
Birch Telecom, Inc.
2300 Main Street, Suite 600
Kansas City, MO 64108
816-300-3731 (voice)
816-300-3350 (fax)
rmulvany@birch.com

CONFIDENTIAL

-----Original Message-----

From: Robert Turkel [mailto:rturkel@broadriver.com]
Sent: Thursday, September 29, 2005 1:40 PM
To: Dillard, Nancy
Cc: Foshee, Lisa
Subject: RE: 19341-U (Generic Change of Law) BellSouth's 1st Requests for Admissions to BroadRiver

We apologize for the late answer concerning a Request for Admissions concerning BroadRiver Communication Corporation. BroadRiver Communication Corporation

A formal admission will be sent out by BroadRiver Communication Corporation.

Robert Turkel
Director of Legal/Regulatory and CLEC Operations
Broadriver Communication Corporation
1000 Hemphill Avenue
Atlanta, Georgia 30318
O: 404-961-1003
C: 404-961-1111

From: Dillard, Nancy [mailto:Nancy.Dillard@BellSouth.COM]
Sent: Friday, August 12, 2005 4:56 PM
To: rturkel@broadriver.com
Cc: Foshee, Lisa
Subject: FW: 19341-U (Generic Change of Law) BellSouth's 1st Requests for Admissions to BroadRiver
Importance: High

The attached is the TRADE SECRET information of BST's 1st Requests for Admissions to BroadRiver.

<<19341-U TRADE SECRET of BST's 1st RFA to BroadRiver (08 12 05).pdf>>

Nancy V. Dillard
Office Administrator
BellSouth Telecommunications, Inc.
Georgia Legal Department
1025 Lenox Park Boulevard
Suite 6C01
Atlanta, Georgia 30319-5309
(404) 986-1719 o; (404) 986-1800 f
IPager: ndillard@imcingular.com

-----Original Message-----

From: Dillard, Nancy
Sent: Friday, August 12, 2005 4:55 PM
To: 'Reece McAlister'; 'leonb@psc.state.ga.us'; 'Clare.mcguire@cuc.oca.state.ga.us'; 'sockleberry@att.com';

CONFIDENTIAL

'bill.atkinson@mail.sprint.com'; 'david.wilson@troutmansanders.com'; 'sdillard@jbpslaw.com'; 'chudak@fh2.com';
'cgerkin@fh2.com'; 'gwatkins@covad.com'; 'jbell@covad.com'; 'dana.shaffer@xo.com'; 'gregd@accessatc.net'; 'awl@sbflaw.net';
'ken.woods@mci.com'; 'david.adelman@sablaw.com'; 'Jones, Clay'; 'frank.lomonte@sablaw.com'; 'ngalloway@gallyn-law.com';
'tlyndall@gallyn-law.com'; 'iturkel@broadriver.com'; 'jheitmann@kelleydrye.com'; 'bfreedson@kelleydrye.com';
'skassman@kelleydrye.com'; 'nedwards@itcdeltacom.com'; 'jism@thlglaw.com'; 'adam.kupetsky@wiltel.com'

Cc: Foshee, Lisa

Subject: 19341-U (Generic Change of Law) BellSouth's 1st Requests for Admissions to BroadRiver

Importance: High

The attached was filed today (August 12, 2005) with the Georgia Public Service Commission.

<<19341-U PUBLIC DISCLOSURE of BST's 1st RFA to BroadRiver (08 12 05).pdf>>

Sent on behalf of

Lisa S. Foshee

General Counsel - Georgia

by Nancy V. Dillard

Office Administrator

BellSouth Telecommunications, Inc.

Georgia Legal Department

1025 Lenox Park Boulevard

Suite 6C01

Atlanta, Georgia 30319-5309

(404) 986-1719 o; (404) 986-1800 f

IPager: ndillard@imcingular.com

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers. 163

CONFIDENTIAL

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition to establish generic docket to consider amendments to interconnection agreements resulting from changes in law, by BellSouth Telecommunications, Inc. | DOCKET NO. 041269-TP

COMPETITIVE CARRIERS OF THE SOUTH, INC.'S RESPONSE TO BELL SOUTH'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1)

The Competitive Carriers of The South, Inc. (CompSouth), pursuant to Rule 28.106-206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, hereby respond to BellSouth Telecommunications, Inc.'s (BellSouth) First Request for Production of Documents (No. 1) to CompSouth dated September 26, 2005.

REQUEST FOR PRODUCTION

1. Please provide any and all documents received by CompSouth in this docket or other similar change of law dockets that evidence or relate to Joseph Gillan's identification of "validated" fiber-based collocators. For example, Mr. Gillan has previously filed an exhibit JPG-5 that includes numbers of "validated" fiber based collocators. This request is not intended to include those responses to requests for admission that BellSouth has served to CLECs, copies of which have been made available to CompSouth.

RESPONSE: The only responsive document is attached. Portions of this document are confidential. Other than that document, the responses to BellSouth's requests for admissions formed the basis for Mr. Gillan's identification of "validated" fiber-based collocators. If an affirmation was not provided by BellSouth to CompSouth, Mr. Gillan concluded that the collocator was not "validated."

s/ Vicki Gordon Kaufman
Bill Magness
CASEY, GENTZ & MAGNESS, L.L.P.
98 San Jacinto Blvd., Ste. 1400
Austin, Texas 78701
Telephone: 512/480-9900
Fax: 512/480-9200
bmagness@phonelaw.com

CONFIDENTIAL

Vicki Gordon Kaufman
MOYLE FLANIGAN KATZ RAYMOND
& SHEEHAN, PA
118 North Gadsden Street
Tallahassee, Florida 32301
Telephone: 850/681-3828
Fax: 850/681-8788
vkaufman@moylelaw.com

Attorneys for CompSouth

CONFIDENTIAL

CERTIFICATE OF SERVICE

Docket No. 041269-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing Response to BellSouth's First Request for Production of Documents was served via Electronic Mail and First Class United States Mail this 30th day of September, 2005, to the following:

Adam Teitzman
Michael Barrett
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0850
ateitzma@psc.state.fl.us
mbarrett@psc.state.fl.us

Michael A. Gross
Florida Cable Telecommunications
Assoc., Inc.
246 E. 6th Avenue, Suite 100
Tallahassee FL 32303
mgross@fcta.com

Nancy White
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301-1556
Nancy.sims@bellsouth.com
Nancy.white@bellsouth.com
Meredith.mays@bellsouth.com

Norman H. Horton, Jr.
Messer, Caparello & Self, P.A.
215 South Monroe Street, Suite 701
P.O. Box 1876
Tallahassee FL 32302-1876
nhorton@lawfla.com

John Heitmann
Garret R. Hargrave
Kelley Drye & Warren, LLP
1200 19th Street, N.W., Suite 500
Washington DC 20036
jheitmann@kelleydrye.com
ghargrave@kelleydrye.com

Kenneth A. Hoffman
Martin P. McDonnell
Rutledge, Ecenia, Purnell & Hoffman
P.O. Box 551
Tallahassee FL 32302
ken@reuphlaw.com
marty@reuphlaw.com

Dana Shaffer
XO Communications, Inc.
105 Molloy Street, Suite 300
Nashville TN 37201
Dana.Shaffer@xo.com

Wanda Montano
Terry Romine
US LEC Corp.
6801 Morrison Blvd.
Charlotte NC 28211
wmontano@uslec.com

Tracy W. Hatch
Senior Attorney
AT&T
101 North Monroe Street, Suite 700
Tallahassee FI 32301
thatch@att.com

Sonia Daniels
Docket Manager
AT&T
1230 Peachtree Street, N.E.
4th Floor
Atlanta GA 30309
soniadaniels@att.com

CONFIDENTIAL

Donna Canzano McNulty
MCI
1203 Governors Square Blvd.
Suite 201
Tallahassee FL 32301
donna.mcnulty@mci.com

De O'Roark
MCI
6 Concourse Parkway, Suite 600
Atlanta GA 30328
De.oroark@mci.com

Floyd Self
Messer, Caparello & Self, P.A.
215 Soth Monroe Street, Suite 701
P.O. Box 1876
Tallahassee FL 32302-1876
fself@lawfla.com

Steven B. Chaiken
Supra Telecommunications and
Info. Systems, Inc.
General Counsel
2901 S.W. 149th Avenue, Suite 300
Miramar FL 33027
steve.chaiken@stis.com

Matthew Feil
FDN Communications
2301 Lucien Way, Suite 200
Maitland FL 32751
mfeil@mail.fdn.com

Nanette Edwards
ITC^DeltaCom Communications, Inc.
7037 Old Madison Pike, Suite 400
Huntsville AL 35806
nedwards@itcdeltacom.com

Susan Masterton
Sprint Communications Company
Limited Partnership
P.O. Box 2214
Tallahassee FL 32316-2214
susan.masterton@mail.sprint.com

Alan C. Gold
Gables One Tower
1320 South Dixie Highway, Suite 870
Coral Gables FL 33146
sgold@kcl.net

Raymond O. Manasco, Jr.
Gainesville Regional "Utilities"
P.O. Box 147117
Station A-138
Gainesville FL 32614-7117
manascoro@gru.com

Charles A. Guyton
Steel Hector & Davis LLP
215 S. Monroe Street, Suite 601
Tallahassee FL 32301-1804
cguyton@steelhector.com

Herb Bornack, CEO
Orlando Telephone Systems, Inc.
4558 S.W. 35th Street, Suite 100
Orlando FL 32811
jerry@orlandotelco.net

Adam Kupetsky
Regulatory Counsel
WilTel Communications, LLC
One Technology Center (TC-15)
100 South Cincinnati
Tulsa OK 74103
adam.kupetsky@wiltel.com

Jonathan S. Marashlian
The Helein Law Group, LLP
8180 Greensboro Drive, Suite 700
McLean VA 22102
ism@thlglaw.com

Bill Magness
Casey Law Firm
98 San Jacinto Blvd., Suite 1400
Austin, TX 78701
bmagness@phonelaw.com

CONFIDENTIAL

Charles (Gene) Watkins
Covad Communications Company
1230 Peachtree Street NE, Suite 1900
Atlanta, GA 30309
GWatkins@Covad.com

C. Everett Boyd, Jr.
Sutherland Asbill Law Firm
3600 Maclay Blvd. S., Suite 202
Tallahassee, FL 32312-1267
Everett.boyd@sablaw.com

D. Adelman/C. Jones/F. LoMonte
Sutherland Law Firm
999 Peachtree Street, NE
Atlanta, GA 30309
David.adelman@sablaw.com

AzulTel, Inc.
2200 S. Dixie Highway, Suite 506
Miami, FL 33133-2300

STS Telecom
12233 S.W. 55th Street, #811
Cooper City, FL 33330-3303
jkrutchik@ststelecom.com

s/Vicki Gordon Kaufman
Vicki Gordon Kaufman

CONFIDENTIAL

CONFIDENTIAL

From: Warren, Kristie (ITCD)
Sent: Friday, September 16, 2005 11:23 AM
To: Edwards, Nanette (ITCD)
Subject: RE: XXXXXXXXXXXX

The only site in [REDACTED] where we have fiber that is not on their list is the [REDACTED]. I'll get you the rest the first of next week.....

From: Warren, Kristie (ITCD)
Sent: Friday, September 16, 2005 10:58 AM
To: Edwards, Nanette (ITCD)
Subject: RE: XXXXXXXXXXXX

The only thing I owed to you were sites where we have fiber that they did not list, correct?

From: Edwards, Nanette (ITCD)
Sent: Friday, September 16, 2005 10:47 AM
To: Mays, Meredith
Cc: Houck, Jean
Subject: RE: XXXXXXXXXXXX

Meredith: I think DeltaCom's deadline on the FBC list is today and I don't have anything yet from Kristie. I have been working on settlement issues for COL case so I have not been on top of it. If I can just get you [REDACTED] with the understanding that we will get you the other states ASAP will that be ok? Or, do we fall under the Compsouth/BellSouth time lines outlining how to deal with this issue? My assumption was that DeltaCom's deal with bell on supplementation is separate and apart from what is being worked out with compsouth.

Just let me know...thanks

Nanette

From: Mays, Meredith [mailto:Meredith.Mays@BellSouth.COM]
Sent: Friday, September 16, 2005 9:21 AM
To: Bill Magness; Edwards, Nanette (ITCD); Romine, Terry
Cc: Rankin, Edward; Shore, Andrew
Subject: XXXXXXXXXXXX
Importance: High

To all (Ed, please forward this to [REDACTED] service list as needed),

BellSouth filed its estimated cross times, including Mr. Cadieux, and DeltaCom witnesses and US LEC. Consistent with the most recent hearing, we would anticipate that we do not need to reserve time for these witnesses. Also, I do not recall whether anyone reserved time for Mr. Wallis, but if not, we would ask that we stipulate his testimony as we have done so in the last 2 hearings.

Please advise if this is agreeable.

CVD1stSuppPODNo1000112

CONFIDENTIAL

CONFIDENTIAL

Meredith

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers. 162

CONFIDENTIAL

**BEFORE THE
MISSISSIPPI PUBLIC SERVICE COMMISSION**

DOCKET NO. 05-AD-139	IN RE: ORDER ESTABLISHING GENERIC DOCKET TO CONSIDER CHANGE- OF-LAW TO EXISTING INTERCONNECTION AGREEMENTS
-----------------------------	-------------------------------------------------------------------------------------------------------------------------------

**COMMUNIGROUP OF JACKSON, INC. D/B/A COMMUNIGROUP'S RESPONSES TO
BELLSOUTH'S FIRST REQUESTS FOR ADMISSION**

COMES NOW CommuniGroup of Jackson, Inc. d/b/a CommuniGroup ("CommuniGroup") pursuant to Rule 6P of the Public Utilities Rules of Practice and Procedure of the Mississippi Public Service Commission (the "Commission") and the Commission's Amended Order Establishing Procedural Schedule and hereby objects and responds to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Requests for Admission to CommuniGroup, served on August 8, 2005 ("the BellSouth Discovery"). Any responses made to BellSouth's interrogatories and requests for production of documents will be made subject to these and subsequent-stated objections, any protective agreement executed between the parties, and/or any protective order issued by the Commission in this docket. CommuniGroup objects to the BellSouth Discovery to the extent it requests information for proceedings to which it is not a party and other than for Mississippi Public Service Commission Docket No. 05-AD-139.

ADMISSIONS

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

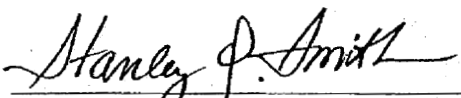


RESPONSE:

CONFIDENTIAL

Respectfully submitted this 7th day of September, 2005.

**COMMUNIGROUP OF JACKSON, INC. D/B/A
COMMUNIGROUP**

By: 
Stanley Q. Smith

Stanley Q. Smith (MS Bar No. 7607)
J. Andrew Gipson (MS Bar No. 100792)
WATKINS LUDLAM WINTER & STENNIS, P.A.
633 North State Street
Post Office Box 427
Jackson, Mississippi 39205-0427
Telephone: (601) 949-4900
Facsimile: (601) 949-4804
email: stansmith@watkinsludlam.com
agipson@watkinsludlam.com

176777.106561.21654

CONFIDENTIAL

CVD1stSuppPODNo1000115

CONFIDENTIAL

CERTIFICATE OF SERVICE

I do hereby certify that I have this day served a true and correct copy of the above and foregoing to the following:

Thomas B. Alexander, Esq. (via U.S. Mail and electronic mail)
General Counsel - Mississippi
BellSouth Telecommunications, Inc.
790 Landmark Center
Jackson, Mississippi 39201
Email: thomas.b.alexander@bellsouth.com

I have also caused to be hand-delivered four (4) copies of the above and foregoing to:

Robert G. Waites, Executive Director
Mississippi Public Utilities Staff
3rd Floor, Woolfolk Building
Jackson, Mississippi 39201

and one (1) copy hand-delivered to each of the following:

George M. Fleming, Esq.
General Counsel
Mississippi Public Utilities Staff
3rd Floor, Woolfolk Building
Jackson, Mississippi 39201

Lynn Carlisle, Esq.
General Counsel
Mississippi Public Service Commission
2nd Floor, Woolfolk Building
Jackson, Mississippi 39201

Pursuant to Rule 6P(2) of the Mississippi Public Service Commission's Public Utilities Rules of Practice and Procedure, I have retained the original of the above document.

This, the 7th day of September, 2005.


STANLEY Q. SMITH

CONFIDENTIAL

VERIFICATION

STATE OF MISSISSIPPI

COUNTY OF HINDS

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the jurisdiction aforesaid, the within named James N.C. Moffat, III of CommuniGroup of Jackson, Inc. d/b/a CommuniGroup, who, after first being duly sworn, stated on his oath that he has reviewed the above and foregoing Responses of CommuniGroup to BellSouth Telecommunications, Inc.'s Discovery Requests and that the responses contained therein are true and correct to the best of his knowledge, information and belief.


James N. C. Moffat, III

SWORN TO AND SUBSCRIBED BEFORE ME, this the 1st ^{September} day of ~~August~~, 2005.



CONFIDENTIAL

CONFIDENTIAL

September 12, 2005

Meredith Mays, Esquire
BellSouth Telecommunications, Inc.
675 West Peachtree Street, Suite 4300
Atlanta, Georgia 30375

Re: Collocation of Cox Facilities in Louisiana

Dear Meredith:

1

From our conversation on Friday afternoon, I understand and trust that this information is satisfactory to BellSouth Telecommunications, and that BellSouth will withdraw its request for admission and subpoena duces tecum. When this is done, I will correspondingly withdraw Cox Florida Telcom's motion to quash and motion for protective order.

Cordially yours,

Robert Scheffel Wright

CONFIDENTIAL

CVD1stSuppPODNo1000118

CONFIDENTIAL

7
From: Edwards, Nanette (ITCD) [mailto:NEdwards@itcdeltacom.com]
Sent: Friday, September 16, 2005 1:37 PM
To: Mays, Meredith
Cc: Warren, Kristie (ITCD); Houck, Jean; Watts, Jerry (ITCD)
Subject: FW: North Carolina [REDACTED]

Merdith:

See note below from Kristie Warren. Please don't hold me to the first of next week just in case we don't have it all together.

Regards,

Nanette

2
3
From: Warren, Kristie (ITCD)
Sent: Friday, September 16, 2005 11:23 AM
To: Edwards, Nanette (ITCD)
Subject: RE: North Carolina

CONFIDENTIAL

PARKER POE

PARKER POE ADAMS & BERNSTEIN LLP

Attorneys and Counselors at Law

Henry C. Campen, Jr.

Partner

Telephone: 919.890.4145

Direct Fax: 919.834.4564

henrycampen@parkerpoe.com

Wachovia Capitol Center
150 Fayetteville Street Mall
Suite 1400
Post Office Box 389
Raleigh, NC 27602-0389
Telephone 919.828.0564
Fax 919.834.4564
www.parkerpoe.com

September 7, 2005

Via Hand-Delivery

Ms. Geneva Thigpen
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27601

Re: Docket P-55, Sub 1549

Dear Ms. Thigpen:

Please find enclosed the original and thirty-one (31) copies of the DukeNet Communications, LLC's CONFIDENTIAL Responses to BellSouth's First Set of Data Requests in the above referenced docket. This response is being filed under seal as it contains proprietary information. Please file the original and return one (1) filed stamped copy to me via our courier.

Thank you for your assistance in this matter.

Sincerely,


Henry C. Campen, Jr.

HCC:ckc

cc: Edward L. Rankin, III (via electronic mail)

CHARLESTON, SC
CHARLOTTE, NC
COLUMBIA, SC
SPARTANBURG, SC

RAL 317734v1

CONFIDENTIAL

CVD1stSuppPODNo1000120

CONFIDENTIAL

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. P-55, Sub 1549

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:)	
)	DUKENET COMMUNICATIONS,
Generic Proceeding to Consider Amendments)	LLC'S RESPONSES TO
To Interconnection Agreements Between)	BELLSOUTH'S FIRST SET OF
BellSouth Telecommunications, Inc. and)	DATA REQUESTS
Competing Local Providers Due to)	
Change of Law)	*PROPRIETARY*

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, DukeNet Communications, LLC ("DukeNet") hereby submits its responses to BellSouth Telecommunications, Inc.'s First Set of Data Requests to DukeNet Communications, LLC, served on August 8, 2005 ("BellSouth's First Set of Data Requests"), as described below. Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to them in BellSouth's First Set of Data Requests.

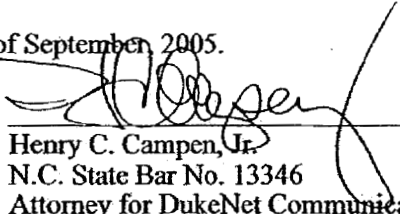
REQUESTS FOR ADMISSION

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

RESPONSE :

RESPONSE PROVIDED BY: Patricia Harriss, Director of Operations, DukeNet Communications, LLC

Respectfully submitted, this 7th day of September, 2005.



Henry C. Campen, Jr.
N.C. State Bar No. 13346
Attorney for DukeNet Communications, LLC
PARKER POE ADAMS & BERNSTEIN LLP
1400 Wachovia Capital Center
Raleigh, NC 27601
Tel. 919-890-4145
Fax 919-834-4564
henrycampen@parkerpoe.com

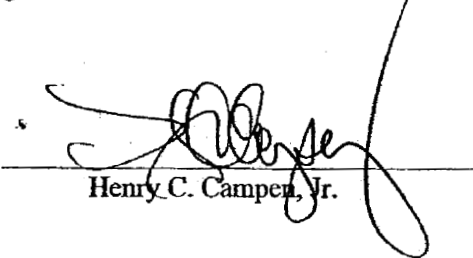
CONFIDENTIAL

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing DUKENET COMMUNICATIONS, LLC'S RESPONSES TO BELLSOUTH'S FIRST SET OF DATA REQUESTS was served on BellSouth at the following address via electronic mail.

Edward L. Rankin, III
BellSouth Telecommunications, Inc.
P.O. Box 30188
Charlotte, NC 28230
edward.rankin@bellsouth.com

This 7th day of September, 2005.


Henry C. Campen, Jr.

CONFIDENTIAL

McCraney, Susan A.

From: Bob [robbs@rfci.net]
Sent: Monday, August 08, 2005 6:59 PM
To: McCraney, Susan A.
Subject: Re: P-55, Sub 1549 Data Requests

McCraney, Susan A. wrote:

>Attached is BellSouth's First Set of Data Requests to
>Communications, Inc.

>

>

>

>Susie McCraney
>BellSouth Telecommunications, Inc.
>NC Legal Department
>(704) 417-8834

>

>On Behalf of
>Edward L. Rankin, III
>Attorney for BellSouth Telecommunications, Inc.

>

>*****

>"The information transmitted is intended only for the person or entity
>to which it is addressed and may contain confidential, proprietary,
>and/or privileged material. Any review, retransmission, dissemination
>or other use of, or taking of any action in reliance upon, this
>information by persons or entities other than the intended recipient is
>prohibited. If you received this in error, please contact the sender
>and delete the material from all computers." 118

>

>

>

CONFIDENTIAL

-----Original Message-----

From: Mays, Meredith
Sent: Friday, September 02, 2005 3:45 PM
To: 'Matthew Feil'
Subject: RE: FDN followup - FBC

We will call you then. Thank you.

-----Original Message-----

From: Matthew Feil [mailto:mfeil@mail.fdn.com]
Sent: Friday, September 02, 2005 1:52 PM
To: Mays, Meredith
Subject: RE: FDN followup - FBC

We're good then. You want me to set up a bridge or you just want to call my office?

-----Original Message-----

From: Mays, Meredith [mailto:Meredith.Mays@BellSouth.COM]
Sent: Friday, September 02, 2005 1:37 PM
To: Matthew Feil
Subject: RE: FDN followup - FBC

Would your folks be available Wednesday 9/7 at 10 a.m. Eastern?

-----Original Message-----

From: Matthew Feil [mailto:mfeil@mail.fdn.com]
Sent: Monday, August 29, 2005 10:17 AM
To: Mays, Meredith
Subject: RE: FDN followup - FBC

So let's try to do next week.

When the dust settles, let me know what date and time works for you and we'll synch up.

-----Original Message-----

From: Mays, Meredith [mailto:Meredith.Mays@BellSouth.COM]
Sent: Monday, August 29, 2005 10:13 AM
To: Matthew Feil
Subject: FDN followup - FBC

The hearing starts tomorrow. We could try to do this afternoon, or, if that doesn't work, we should shoot for sometime next week. Let me know -- thanks.

-----Original Message-----

From: Matthew Feil [mailto:mfeil@mail.fdn.com]
Sent: Monday, August 29, 2005 10:08 AM
To: Mays, Meredith
Subject: RE: Discovery -- CONFIDENTIAL/PROPREITARY INFORMATION ATTACHED

That's why I'm thinking that your folks should talk to my folks. Also. to be

CONFIDENTIAL

Do you want to try to do a call this week or next or is the Georgia hearing in the way?

-----Original Message-----

From: Mays, Meredith [mailto:Meredith.Mays@BellSouth.COM]
Sent: Monday, August 29, 2005 10:02 AM
To: Matthew Feil
Subject: RE: Discovery -- CONFIDENTIAL/PROPREITARY
INFORMATION ATTACHED

Thanks.

7

Meredith

-----Original Message-----

From: Matthew Feil [mailto:mfeil@mail.fdn.com]
Sent: Friday, August 26, 2005 1:02 PM
To: Mays, Meredith
Subject: RE: Discovery -- CONFIDENTIAL/PROPREITARY
INFORMATION ATTACHED

Yes, we're all square on the agreement, though I wasn't crazy that you had an old signature on the form (from July 15). But, I take the correspondence heretofore to mean that since you've signed and I signed, it's binding.

The confidential info is attached (so if I'm wrong about the above, say so). My admin hasn't finished all the silly filing paperwork that goes with it, but we'll send that out later today.

Call me if and when you need to. I'm here all day. If you need one of my tech folks to talk to you or your techs, we'll arrange it if need be.

-----Original Message-----

From: Mays, Meredith [mailto:Meredith.Mays@BellSouth.COM]
Sent: Friday, August 26, 2005 12:56 PM
To: Matthew Feil
Subject: Discovery

Did you get all that you needed re: protective agreement? If you could email your discovery responses, I would be appreciative of same. Otherwise, do you have a minule where we could talk about them?

CONFIDENTIAL

"The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers." 118

CONFIDENTIAL

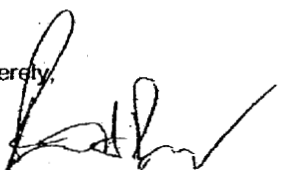
9250 West Flagler St., Miami, FL 33174

Nancy B. White
c/o Nancy H. Sims
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301

Dear Ms. White:

REDACTED

Sincerely,


Brett H. Bayag

CONFIDENTIAL

CVD1stSuppPODNo1000128

CONFIDENTIAL

-----Original Message-----

From: Bob Middleton [mailto:bmiddleton@rjmlaw.net]
Sent: Monday, September 26, 2005 3:00 PM
To: Mays, Meredith
Subject: RE: Georgia Public Web

1 very good , i'll send a reply [REDACTED] bob

ROBERT J. MIDDLETON, JR., LLC
2417 Westgate Drive
Post Office Box 70667
Albany, Georgia 31707
bmiddleton@rjmlaw.net
www.rjmlaw.net
(229) 446-3936 (office)
(229) 347-1831 (cell)
(229) 888-2156 (fax)

NOTICE: This e-mail message and all attachments transmitted with it may contain legally privileged and confidential information intended solely for the use of the addressee. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution, copying, or other use of this message or its attachments is strictly prohibited. If you have received this message in error, please notify the sender immediately by telephone (229-446-3936) or by electronic mail (bmiddleton@rjmlaw.net), and delete this message and all copies and backups thereof. Thank you.

From: Mays, Meredith [mailto:Meredith.Mays@bellsouth.com]
Sent: Monday, September 26, 2005 2:47 PM
To: Bob Middleton
Subject: RE: Georgia Public Web

2 [REDACTED]
-----Original Message-----

From: Bob Middleton [mailto:bmiddleton@rjmlaw.net]
Sent: Monday, September 26, 2005 2:25 PM
To: Mays, Meredith
Subject: RE: Georgia Public Web

3 i wasn't sure about the discovery rights in fla , you know we've been arguing over that up here ... [REDACTED] or here as to 3rd party discovery rights ? frankly i didn't see it as important enough to get down and research until we heard back it was really necessary to provide . if forgoing is acceptable i'll send a response to the data request with that qualification . let me know . bob

ROBERT J. MIDDLETON, JR., LLC
2417 Westgate Drive
Post Office Box 70667
Albany, Georgia 31707

CONFIDENTIAL

bmiddleton@rjmlaw.net
www.rjmlaw.net
(229) 446-3936 (office)
(229) 347-1831 (cell)
(229) 888-2156 (fax)

NOTICE: This e-mail message and all attachments transmitted with it may contain legally privileged and confidential information intended solely for the use of the addressee. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution, copying, or other use of this message or its attachments is strictly prohibited. If you have received this message in error, please notify the sender immediately by telephone (229-446-3936) or by electronic mail (bmiddleton@rjmlaw.net), and delete this message and all copies and backups thereof. Thank you.

From: Mays, Meredith [<mailto:Meredith.Mays@bellsouth.com>]
Sent: Friday, September 23, 2005 3:21 PM
To: bmiddleton@rjmlaw.net
Subject: Georgia Public Web

Bob,

1
2
3
it would be great. We served requests for admission to this effect in FL, but I don't believe GPW has responded. Can you provide that? If you have questions, or we need to discuss, please let me know.

Meredith Mays
Sr. Regulatory Counsel - BellSouth Telecommunications, Inc.
404-335-0750

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers. 162

CONFIDENTIAL

SQUIRE SANDERS | LEGAL
COUNSEL
WORLDWIDE

SQUIRE, SANDERS & DEMPSEY L.L.P.

Including
STEEL HECTOR & DAVIS LLP

215 South Monroe Street, Suite 601
Tallahassee, Florida 32301-1804

Office: +1.850.222.2300

Fax: +1.850.222.8410

September 19, 2005

Mr. Andrew D. Shore
Senior Regulatory Counsel
BellSouth Telecommunications, Inc.
675 W. Peachtree Street, Suite 4300
Atlanta, GA 30375

RECEIVED

SEP 21 2005

U.S. MAIL REG. RELATIONS
TALLAHASSEE, FL

Re: Docket No. 041269-TP

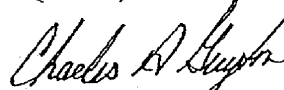
Dear Mr. Shore:

Enclosed are the City of Gainesville d/b/a GRUCom's ("GRUCom") Responses to BellSouth's First Requests for Admission to City of Gainesville d/b/a GRUCom.

If you have any questions regarding this transmittal please feel free to contact me.

Very truly yours,

SQUIRE, SANDERS & DEMPSEY L.L.P.



Charles A. Guyton

Enclosure

TAL_1998 53090v1

CINCINNATI • CLEVELAND • COLUMBUS • HOUSTON • LOS ANGELES • MIAMI • NEW YORK • PALO ALTO • PHOENIX • SAN FRANCISCO • TALLAHASSEE • TAMPA • TYSONS CORNER
WASHINGTON DC • WEST PALM BEACH | CARACAS • RIO DE JANEIRO • SANTO DOMINGO | BRATISLAVA • BRUSSELS • BUDAPEST • LONDON • MADRID • MILAN • MOSCOW
PRAGUE • WARSAW | BEIJING • HONG KONG • SHANGHAI • TOKYO | ASSOCIATED OFFICES: BUCHAREST • BUENOS AIRES • DUBLIN • KYIV • SANTIAGO

www.ssd.com

CVD1stSuppPODNo1000131

CONFIDENTIAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to establish generic docket to)
consider amendments to interconnection)
agreements resulting from changes in law, by)
BellSouth Telecommunications, Inc.)

Docket No. 041269-TP
Dated: September 19, 2005

**GRUCOM'S RESPONSES TO
BELLSOUTH'S FIRST REQUESTS FOR ADMISSION TO
CITY OF GAINESVILLE d/b/a GRUCOM**

Pursuant to Rule 28-106.206, Florida Administrative Code and Rule 1.370, Florida Rules of Civil Procedure, the City of Gainesville d/b/a GRUCOM ("GRUCOM") responds as follows to BellSouth's First Requests for Admission to City of Gainesville d/b/a GRUCOM served on August 31, 2005:

1. 

CONFIDENTIAL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of GRUCom's Responses To BellSouth's First Requests for Admission to City of Gainesville d/b/a GRUCom has been served by Electronic Mail and U.S. Mail this 19th day of September, 2005 on:

Adam J. Teitzman, Senior Attorney
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ateitzma@psc.state.fl.us

Nancy B. White, Esq.
c/o Nancy H. Sims
Bellsouth Telecommunications, Inc.
150 S Monroe St., Ste. 400
Tallahassee, FL 32301
nancy.white@bellsouth.com
nancy.sims@bellsouth.com

Andrew D. Shore, Esq.
Meredith E. Mays, Esq.
Bellsouth Telecommunications, Inc.
675 W. Peachtree St., NE
Suite 4300
Atlanta, GA 30375
andrew.shore@bellsouth.com
meredith.mays@bellsouth.com

Tracy W. Hatch, Esq.
Senior Attorney
AT&T
101 N Monroe St., Ste. 700
Tallahassee, FL 32301
thatch@att.com

Sonia Daniels, Docket Manager
AT&T
1230 Peachtree St., NE
4th Floor
Atlanta, GA 30309
sdaniels@att.com

Donna Canzano McNulty, Esq.
MCI
1203 Governors Square Blvd., Ste. 201
Tallahassee, FL 32301-2960
donna.mcnulty@mci.com

John J. Heitmann, Esq.
NuVox/NuVox-New South/Xspedius
Kelley Drye & Warren LLP
1200 19th St., NW, 5th Floor
Washington, DC 20036
jheitmann@kelleydrye.com

Floyd R. Self, Esq.
Norman H. Horton, Jr., Esq.
Messer, Caparello & Self, P.A.
P.O. Box 1876
Tallahassee, FL 32302-1876
fself@lawfla.com
nhorton@lawfla.com

Nanette Edwards, Esq.
ITC^DeltaCom Communications, Inc.
7037 Old Madison Pike, Ste. 400
Huntsville, AL 35806
nedwards@itcdelta.com

Steven B. Chaiken, Esq.
Supra Telecommunications and
Information Systems, Inc.
General Counsel
2901 SW 149th Avenue, Ste. 300
Miramar, FL 33027
steve.chaiken@stis.com

CONFIDENTIAL

Herb Bornack, CEO
Orlando Telephone Company, Inc.
4558 S.W. 35th Street
Suite 100
Orlando, FL 32811
jerry@orlandotelco.net

De O'Roark, Esq.
MCI
6 Concourse Parkway, Ste. 600
Atlanta, GA 30328
de.oroark@mci.com

Vicki Gordon Kaufman, Esq.
Moyle, Flanigan, Katz, Raymond &
Sheehan, PA
CompSouth/Covad
118 N Gadsden Street
Tallahassee, Florida 32301
vkaufman@moylelaw.com

Matthew Feil, Esq.
FDN Communications
2301 Lucien Way, Ste. 200
Maitland, FL 32751
mfeil@mail.fdn.com

Michael A. Gross
Florida Cable Telecommunications Assoc.
246 E. 6th Avenue, Ste. 100
Tallahassee, Florida 32303
mgross@fcta.com

Susan S. Masterton, Esq.
Sprint
P.O. Box 2214
Tallahassee, FL 32316-2214
susan.masterton@email.sprint.com

Kenneth A. Hoffman, Esq.
Martin P. McDonnell, Esq.
Rutledge, Ecenia, Purnell & Hoffman
P.O. Box 551
Tallahassee, FL 32302
ken@reuphlaw.com
marty@reuphlaw.com

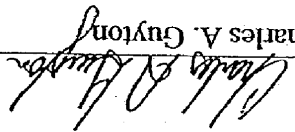
Alan C. Gold, Esq.
Alan C. Gold, P.A.
1320 South Dixie Highway, Ste. 870
Coral Gables, FL 33146
agold@kcl.net

Adam Kupetsky, Esq.
Regulatory Counsel
WiTel Communications, LLC
One Technology Center (TC-15)
100 South Cincinnati
Tulsa, OK 74103
adam.kupetsky@witel.com

Dana Shaffer
XO Communications, Inc.
105 Molly St., Ste. 300
Nashville, TN 37201
dana.shaffer@xo.com

Wanda Montano, Esq.
Terry Romine, Esq.
US LEC Corp.
6801 Morrison Blvd.
Charlotte, N.C. 28211
wmontano@uslec.com

Charles (Gene) E. Watkins
Covad Communications Co.
1230 Peachtree St., NE
Suite 1900
Atlanta, GA 30309
g Watkins@covad.com


Charles A. Guyton

Jonathan S. Marashlian, Esq.
Azul Tel, Inc.
The Helein Law Group, LLP
8180 Greensboro Drive, Ste. 700
McLean, VA 22102
ism@hljlaw.com

CONFIDENTIAL

-----Original Message-----

From: Collins, Darian [mailto:Darian_Collins@icgcomm.com]

Sent: Friday, August 19, 2005 4:49 PM

To: Rankin, Edward

Cc: Collins, Darian

Subject: RE: Voice mail (P-55, Sub 1549)

Ed,

FNW

Darian Collins
Carrier Relations Manager
ICG Communications
161 Inverness Drive West
Englewood, CO 80112
303-414-5042

CONFIDENTIAL

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 ICG TELECOM
GROUP, INC.**

BellSouth Telecommunications, Inc. ("BellSouth") hereby serves its first set of data requests on ICG Telecom Group, Inc. (hereinafter "ICG"). 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 "ICG" 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*. As set forth there, the term refers to a collocation arrangement, with active power supply, that has a non-ILEC fiber-

CONFIDENTIAL

optic cable that 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:

This 8th day of August, 2005.

Edward L. Rankin, III
300 S. Brevard Street, Room 1521
P.O. Box 30188
Charlotte, NC 28230
(704) 417-8833

Andrew D. Shore
Meredith Mays
675 W. Peachtree Street, Suite 4300
Atlanta, GA 303075
(404) 335-0765

CONFIDENTIAL

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2005, I served the foregoing data requests on the party to whom these data requests are directed via electronic mail, as follows:

Darian Collins
ICG Telecom Group, Inc.
161 Inverness Drive West
Kenansville, NC 28349
Darian_Collins@icgcomm.com

CONFIDENTIAL



Via Regular Mail

RECEIVED

SEP 12 2005

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

September 6, 2005

Andrew D. Shore
Senior Regulatory Counsel
BellSouth Telecommunications, Inc.
150 South Monroe Street, RM 400
Tallahassee, Florida 32301

Re: Docket No. 041269-TP
**Looking Glass Networks, Inc.'s Response to BellSouth Telecommunications,
Inc.'s Requests to Admit**

Dear Mr. Shore:

Enclosed please find a copy of Looking Glass Networks, Inc.'s ("LGN") response to BellSouth's First Requests for Admission regarding Docket No. 041269-TP. If you need any further information or have any questions concerning this response, please contact me at (630) 242-2015.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jodi J. Caro".

Jodi J. Caro
Vice President & General Counsel

encl:

CONFIDENTIAL

CONFIDENTIAL

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: August 8, 2005
_____)

BellSouth's First Requests for Admission to Looking Glass Networks, Inc.

BellSouth Telecommunications, Inc. ("BellSouth") hereby serves its first requests for admission on Looking Glass Networks, Inc. (hereinafter "Looking Glass"). 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 "Looking Glass" and "you," "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*. As set forth there, the term refers to a collocation arrangement, with active power supply, that has a non-ILEC fiber-optic cable that both terminates at the collocation facility and leaves the wire center. The collocation

CONFIDENTIAL

CVD1stSuppPODNo1000141

CONFIDENTIAL

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 facilitates both terminate in and leave the wire center.

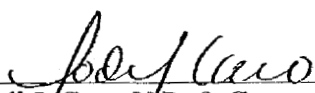
Requests for Admission

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

BellSouth wire centers:

ANSWER:

Respectfully submitted this day 1th of September, 2005.



Jodi J. Caro, V.P. & General Counsel
Looking Glass Networks, Inc.
1111 W. 22nd Street, Suite 600
Oak Brook, IL 60523
(630) 242-2015

CONFIDENTIAL

CONFIDENTIAL

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

MCI metro 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:

FURTHER RESPONSE:

CONFIDENTIAL

CVD1stSuppPODNo1000143

CONFIDENTIAL

September 12, 2005.

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

CERTIFICATE OF SERVICE

The undersigned attorney for MCI certifies that the foregoing response was served via electronic mail, as follows:

Edward L. Rankin, III
BellSouth Telecommunications, Inc.
300 S. Brevard Street, Room 1521
Post Office Box 30188
Charlotte, North Carolina 28230
edward.rankin@bellsouth.com

Meredith Mays
BellSouth Telecommunications, Inc.
675 W. Peachtree Street, Suite 4300
Atlanta, Georgia 30375
Meredith.Mays@BellSouth.com

September 12, 2005.

Ralph McDonald

191164.2

CONFIDENTIAL

CONFIDENTIAL

-----Original Message-----

From: Mays, Meredith
Sent: Thursday, September 08, 2005 10:49 AM
To: 'rmcdonald@bdixon.com'
Cc: Rankin, Edward; Shore, Andrew
Subject: Network Telephone and MCI discovery responses in NC

Ralph,

1
2
3
You filed discovery responses on behalf of both Network Telephone and MCI in NC.

BellSouth would like very much to understand with more specificity the basis of Can
you forward this email as appropriate so that we can communicate with the appropriate person
from these companies on this issue?

Meredith Mays
404-335-0750

CONFIDENTIAL

FROM

(WED) SEP 7 2005 14:33/ST. 14:33/No. 683789E462 P. 2

networ

THE BACKBONE OF THE CITY

www.memphisnetworx.com

September 7, 2005

Guy M. Hicks
General Counsel
BellSouth Telecommunications, Inc.
333 Commerce St.
Suite 2101
Nashville, TN 37201-3300

Dear Mr. Hicks,

~~Per your request, I am submitting this letter of notification that Memphis Networx, LLC, located at 7620 Appling Center Dr., Suite 101, Memphis, TN 38133 is a Facility-based CLEC~~

If you have additional questions or need further assistance, please call me at 901-207-2105.

Respectfully,



Joyce J. Patterson
Director - Operations
Memphis Networx, LLC
7620 Appling Center Dr.
Suite 101
Memphis, TN 38133

7620 Appling Center Drive • Suite 101 • Memphis, TN 38133 • 901.213.5112

CONFIDENTIAL

CVD1stSuppPODNo1000146

CONFIDENTIAL



M O M E N T U M
T E L E C O MSM

September 30, 2005

Meredith Mays
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301

Re: Docket No. 041269-TP

Dear Ms. Mays:

Enclosed are Momentum Telecom, Inc.'s responses to BellSouth First Set of Interrogatories in the above referenced matter.

Sincerely,

Peggy D. McKay

Peggy D. McKay
Director, Product Management
Momentum Telecom, Inc.
2700 Corporate Drive
Suite 200
Birmingham, AL 35242

Enclosures

CVD1stSuppPODNo1000147

CONFIDENTIAL

INTERROGATORIES

1. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee wherein Momentum is a fiber-based collocator.

Momentum Response:

2. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee in which Momentum has an active collocation arrangement(s) and obtains fiber or fiber capacity from another entity that is not BellSouth, whether or not Momentum considers such arrangements to qualify as "fiber-based collocation" pursuant to the FCC's definition.

Momentum Response:

Please describe with specificity the manner in which Momentum obtains fiber. If Momentum contends that it is not a fiber based collocator in any such wire center, please explain with specificity the basis for this contention.

Momentum Response:

3. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee in which Momentum has an active collocation arrangement(s) and obtains access to transport facilities from another entity that is not BellSouth, whether or not Momentum considers such facilities to qualify as "comparable transmission facilities" pursuant to the FCC's definition.

Momentum Response:

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

Momentum Response:

CONFIDENTIAL

PARKER POE

PARKER POE ADAMS & BERNSTEIN LLP

Attorneys and Counselors at Law

Henry C. Campen, Jr.

Partner

Telephone: 919.890.4145

Direct Fax: 919.834.4564

henrycampen@parkerpoe.com

Wachovia Capitol Center
150 Fayetteville Street Mall
Suite 1400
Post Office Box 389
Raleigh, NC 27602-0389
Telephone 919.828.0564
Fax 919.834.4564
www.parkerpoe.com

September 7, 2005

Via Hand-Delivery

Ms. Geneva Thigpen
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27601

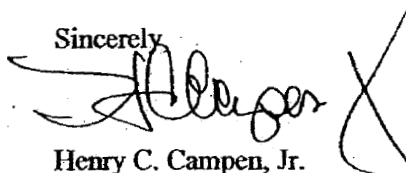
Re: Docket P-55, Sub 1549

Dear Ms. Thigpen:

Please find enclosed the original and thirty-one (31) copies of the Confidential Response of NuVox Communications, Inc. to BellSouth's First Set of Data Requests in the above referenced docket. This response is being filed under seal as it contains proprietary information. Please file the original and return one (1) filed stamped copy to me via our courier.

Thank you for your assistance in this matter.

Sincerely,


Henry C. Campen, Jr.

HCC:ckc

cc: Edward L. Rankin, III (via electronic mail)

CHARLESTON, SC
CHARLOTTE, NC
COLUMBIA, SC
SPARTANBURG, SC

RAL 318166v1

CONFIDENTIAL

CVD1stSuppPODNo1000149

CONFIDENTIAL

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. P-55, Sub 1549

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:)	
)	RESPONSE OF NUVOX
Generic Proceeding to Consider Amendments)	COMMUNICATIONS, INC.
To Interconnection Agreements Between)	TO BELLSOUTH'S FIRST SET
BellSouth Telecommunications, Inc. and)	OF DATA REQUESTS
Competing Local Providers Due to)	
Change of Law)	*PROPRIETARY*

On August 8, 2005, BellSouth Telecommunications, Inc. ("BellSouth") served its first data request on NuVox Communications, Inc. ("NuVox"). NuVox hereby responds to the single question posed therein.

DATA REQUEST

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

NUVOX RESPONSE

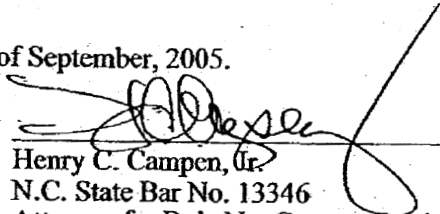
RAL 318165v1

CONFIDENTIAL

CVD1stSuppPODNo1000150

CONFIDENTIAL

Respectfully submitted, this 7th day of September, 2005.



Henry C. Campen, Jr.
N.C. State Bar No. 13346
Attorney for DukeNet Communications, LLC
PARKER POE ADAMS & BERNSTEIN LLP
1400 Wachovia Capital Center
Raleigh, NC 27601
Tel. 919-890-4145
Fax 919-834-4564
henrycampen@parkerpoe.com

CONFIDENTIAL

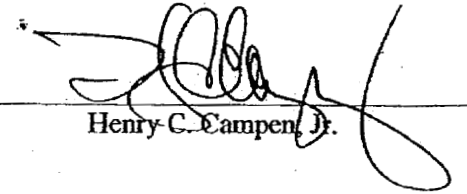
CONFIDENTIAL

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing RESPONSE OF NUVOX COMMUNICATIONS, INC. TO BELLSOUTH'S FIRST SET OF DATA REQUESTS was served on BellSouth at the following address via electronic mail.

Edward L. Rankin, III
BellSouth Telecommunications, Inc.
P.O. Box 30188
Charlotte, NC 28230
edward.rankin@bellsouth.com

This 7th day of September, 2005.


Henry C. Campen, Jr.

CONFIDENTIAL

CONFIDENTIAL

-----Original Message-----

From: Mays, Meredith
Sent: Thursday, September 08, 2005 12:33 PM
To: 'henrycampen@parkerpoe.com'
Cc: Rankin, Edward; Shore, Andrew
Subject: Nuvox discovery response

Henry,

7
BellSouth is in receipt of Nuvox's response to our request for admission. We would appreciate having the opportunity to speak with the appropriate person at Nuvox to understand with more specificity [REDACTED] Could you please forward this email or otherwise contact me so that we can do so?

Thank you,

Meredith Mays
404-335-0750

CONFIDENTIAL

-----Original Message-----

From: Mays, Meredith
Sent: Thursday, September 15, 2005 1:26 PM
To: 'Berlin, Susan'
Cc: Cadieux, Ed
Subject: RE: Nuvox discovery response

2 tomorrow should be fine. My direct dial is 404-335-0750.

-----Original Message-----

From: Berlin, Susan [mailto:SBerlin@nuvox.com]
Sent: Thursday, September 15, 2005 1:12 PM
To: Mays, Meredith
Cc: Cadieux, Ed
Subject: RE: Nuvox discovery response

How about 2:00 EDT? I am still not working in my new office and if I could call you, it would be easier (please send me the best number to use.). If I can finagle it, I plan to get Ed on the call too because I believe

7 [REDACTED] Thanks

-----Original Message-----

From: Mays, Meredith [mailto:Meredith.Mays@BellSouth.COM]
Sent: Thu Sep 15 12:56:57 2005
To: Berlin, Susan
Cc: Cadieux, Ed
Subject: RE: Nuvox discovery response

Sure. What time, and what number shall I call?

-----Original Message-----

From: Berlin, Susan [mailto:SBerlin@nuvox.com]
Sent: Thursday, September 15, 2005 12:41 PM
To: Mays, Meredith
Cc: Cadieux, Ed
Subject: RE: Nuvox discovery response

Meredith,
Would early tomorrow afternoon work for you?
Thanks

-----Original Message-----

From: Mays, Meredith [mailto:Meredith.Mays@BellSouth.COM]
Sent: Thu Sep 15 11:53:48 2005
To: Berlin, Susan
Subject: RE: Nuvox discovery response

Susan,

The NC hearing is next week. I would appreciate speaking to you about this today or tomorrow.

-----Original Message-----

CONFIDENTIAL

From: Campen, Jr., Henry C. [mailto:henrycampen@parkerpoe.com]
Sent: Thursday, September 08, 2005 6:21 PM
To: Mays, Meredith
Cc: Berlin, Susan
Subject: RE: Nuvox discovery response

I have forwarded your request to Susan Berlin at NuVox

-----Original Message-----

From: Mays, Meredith [mailto:Meredith.Mays@BellSouth.COM]
Sent: Thursday, September 08, 2005 12:33 PM
To: Campen, Jr., Henry C.
Cc: Rankin, Edward; Shore, Andrew
Subject: Nuvox discovery response

Henry,

BellSouth is in receipt of Nuvox's response to our request for admission. We would appreciate having the opportunity to speak with the appropriate person at Nuvox to understand with more specificity [REDACTED]

1 [REDACTED] Could you please forward this email or otherwise contact me so that we can do so?

Thank you,

Meredith Mays
404-335-0750

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers. 163

IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this communication (or in any attachment).

PRIVILEGED AND CONFIDENTIAL: This electronic message and any attachments are confidential property of the sender. The information is intended only for the use of the person to whom it was addressed. Any other interception, copying, accessing, or disclosure of this message is prohibited. The sender takes no responsibility for any unauthorized

CONFIDENTIAL

reliance on this message. If you have received this message in error,
please immediately notify the sender and purge the message you received.
Do not forward this message without permission.

CONFIDENTIAL

-----Original Message-----

From: HEPBURN, MARK E (SBCSI) [mailto:MH4424@txmail.sbc.com]
Sent: Thursday, September 15, 2005 1:25 PM
To: Mays, Meredith
Subject: RE: BellSouth's_First_Requests_for_Admission_to_SBC_Telecom.DOC

Sorry.

Here it is.

Thanks

Mark

-----Original Message-----

From: Mays, Meredith [mailto:Meredith.Mays@bellsouth.com]
Sent: Thursday, September 15, 2005 11:28 AM
To: HEPBURN, MARK E (SBCSI)
Subject: RE: BellSouth's_First_Requests_for_Admission_to_SBC_Telecom.DOC

I think you forgot the attachment.

-----Original Message-----

From: HEPBURN, MARK E (SBCSI) [mailto:MH4424@txmail.sbc.com]
Sent: Thursday, September 15, 2005 12:26 PM
To: Mays, Meredith
Subject: FW: BellSouth's_First_Requests_for_Admission_to_SBC_Telecom.DOC

1

 Any questions please give me a call.

Thanks

Mark Hepburn
Associate Director, Regulatory Relations
SBC Long Distance, LLC
1010 N. St. Mary's St., Rm. 1335
San Antonio, TX 78215
Ofc. 210-246-8041
E-Mail mh4424@sbccom

This e-mail and any files transmitted with it are the property of SBC Telecom, Inc. and/or its affiliates, are confidential, and are intended solely for the use of the individual or entity to whom this e-mail is addressed. If you are not one of the named recipients or otherwise have reason to believe that you have received this message in error, please notify the sender at 210-246-8041 and delete this message immediately from your computer. Any other use, retention, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

-----Original Message-----

From: Mays, Meredith [mailto:Meredith.Mays@bellsouth.com]
Sent: Thursday, September 15, 2005 10:51 AM
To: PAULSEN, CAROL (SBCSI)
Subject: RE: BellSouth's_First_Requests_for_Admission_to_SBC_Telecom.DOC

Hey Carol,

CONFIDENTIAL

I wanted to follow-up on this - as we discussed, we were hoping to obtain a complete response to [REDACTED] Do you have an idea of when we can expect SBC's response?

Thank you, and if I need to resend/re-serve a clean copy with no highlights, just tell me to whom to direct this.

Meredith

-----Original Message-----

From: PAULSEN, CAROL (SBCSI) [mailto:cp5962@txmail.sbc.com]
Sent: Wednesday, September 07, 2005 5:19 PM
To: Mays, Meredith
Subject: FW: BellSouth's_First_Requests_for_Admission_to_SBC_Telecom.DOC

Meredith - Please call me regarding this request. Thanks.

Carol Paulsen
Director-Regulatory
210-246-8750

-----Original Message-----

From: Mays, Meredith [mailto:Meredith.Mays@bellsouth.com]
Sent: Tuesday, September 06, 2005 9:08 AM
To: GOODWIN, FRED A (SBCSI)
Subject: RE: BellSouth's_First_Requests_for_Admission_to_SBC_Telecom.DOC

Fred,

Just wanted to follow-up with you once more on the discovery attached. Thank you again for your timely feedback on [REDACTED]. The purpose of this email is to request your assistance once more, preferably to obtain one complete response that can be formally filed with the FPSC. Would you be able to forward that request as needed? If we need to discuss, please let me know. [REDACTED] [REDACTED] and we've got a hearing there next week. There are also [REDACTED] that hearing isn't for a few weeks, but it would be great if we could simply have one formal response to all of this.

Meredith

Please let me know your reaction,

Best regards,

Meredith

<<LEGAL-#596273-v1-041269-TP;_BellSouth's_First_Requests_for_Admission_to_SBC_Telecom.DOC>>

-----Original Message-----

From: Mays, Meredith
Sent: Friday, August 26, 2005 1:54 PM
To: 'GOODWIN, FRED A (SBCTI)'; 'fg8578@sb.com'
Subject: BellSouth's_First_Requests_for_Admission_to_SBC_Telecom.DOC
Importance: High

CONFIDENTIAL

Fred,

An old email came up, I used both just to make sure.

I've highlighted the [REDACTED] in the attached for ease of reference.

Many thanks for your assistance.

Meredith

<< File: LEGAL-#596273-v1-041269-
TP; BellSouth's First Requests for Admission to SBC Telecom.DOC >>

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers. 162

CONFIDENTIAL

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: August 8, 2005
_____)

BellSouth's First Requests for Admission to SBC Telecom, Inc.

BellSouth Telecommunications, Inc. ("BellSouth") hereby serves its first requests for admission on SBC Telecom, Inc. (hereinafter "SBC"). 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 "SBC" 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*. As set forth there, the term refers to a collocation arrangement, with active power supply, that has a non-ILEC fiber-optic cable that 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

CONFIDENTIAL

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:

CONFIDENTIAL

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

CONFIDENTIAL

From: Mays, Meredith
Sent: Friday, September 30, 2005 4:34 PM
To: 'Cowin, Joe P [CC]'
Subject: Sprint - Discovery

Joe,

This email is to follow-up on our conversation of this week, in which you advised that BellSouth could expect Sprint's responses to its NC and FL discovery by today.

Thank you,

Meredith Mays
Senior Regulatory Counsel
BellSouth Telecommunications, Inc.
404-335-0750

CONFIDENTIAL

From: Mays, Meredith
Sent: Friday, September 30, 2005 12:12 PM
To: 'Anthony.Lingis@telcove.com'
Subject: Attached Document

Importance: High

Anthony,

The list of collocations is contained within this document.

I appreciate your assistance with this. If there are other fiber-based collocations within the nine Southeastern states (AL, FL, GA, KY, LA, MS, NC, SC, and TN), that are not listed we would appreciate knowing that as well (if possible).

Meredith Mays
Senior Regulatory Counsel
BellSouth Telecommunications, Inc.
404-335-0750



LEGAL-#604316-v1
-041269-TP_Ad...

CONFIDENTIAL

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 30, 2005
_____)

BELLSOUTH'S FIRST REQUESTS FOR ADMISSION TO TELCOVE INVESTMENT, LLC, TELCOVE OF FLORIDA, INC., AND TELCOVE OF JACKSONVILLE, INC.

BellSouth Telecommunications, Inc. ("BellSouth") hereby serves its first requests for admission on TelCove Investment, LLC, TelCove of Florida, Inc., and TelCove of Jacksonville, Inc. (hereinafter "TelCove"). 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 "TelCove" 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*. As set forth there, the term refers to a collocation arrangement, with active power supply, that has a non-ILEC fiber-

CONFIDENTIAL

optic cable that 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:

CONFIDENTIAL

This 30th day of September, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE
c/o Nancy Sims
150 South 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

CONFIDENTIAL

-----Original Message-----

From: Mays, Meredith
Sent: Friday, September 30, 2005 4:09 PM
To: 'Anthony Lingis'
Subject: RE: Attached Document

Sure. The full definition is at 47 C.F.R. 51.5, and it says:

"A fiber-based collocator is any carrier, unaffiliated with the incumbent LEC, that maintains a collocation arrangement in an incumbent LEC wire center, with active electrical power supply, and operates a fiber-optic cable or comparable transmission facility that (1) terminates at a collocation arrangement within the wire center; (2) leaves the incumbent LEC wire center premises; and (3) is owned by a party other than the incumbent LEC or any affiliate of the incumbent LEC, except as set forth in this paragraph. Dark fiber obtained from an incumbent LEC on an indefeasible right of use shall be treated as non-incumbent LEC fiber-optic cable. Two or more affiliated fiber-based collocators in a single wire center shall collectively be counted as a single fiber-based collocator. For purposes of this paragraph, the term affiliate is defined by 47 U.S.C. 153(a) and any relevant interpretation in this Title."

-----Original Message-----

From: Anthony Lingis [mailto:anthony.lingis@telcove.com]
Sent: Friday, September 30, 2005 2:53 PM
To: Mays, Meredith
Subject: RE: Attached Document

Could you please define the meaning of "fiber-based"?

From: Mays, Meredith [mailto:Meredith.Mays@BellSouth.COM]
Sent: Friday, September 30, 2005 12:12 PM
To: Anthony Lingis
Subject: Attached Document
Importance: High

Anthony,

The list of collocations is contained within this document.

I appreciate your assistance with this. If there are other fiber-based collocations within the nine Southeastern states (AL, FL, GA, KY, LA, MS, NC, SC, and TN), that are not listed we would appreciate knowing that as well (if possible).

Meredith Mays
Senior Regulatory Counsel
BellSouth Telecommunications, Inc.
404-335-0750

<<LEGAL-#604316-v1-041269-TP;_Admissions_to_TelCove.DOC>>

CONFIDENTIAL

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers. 163

CONFIDENTIAL

-----Original Message-----

From: Mays, Meredith
Sent: Thursday, September 15, 2005 1:26 PM
To: 'Vicki Gordon Kaufman'
Cc: White, Nancy
Subject: RE: 041269 -- Telepak

If you provide us with a letter responding to the questions, we will withdraw the subpoena, which would eliminate the need for filing a motion to quash. As far as confidentiality, I believe you are aware of the FPSC's protective order in this case. If Telepak wishes to sign the regionwide protective agreement as well, I will forward that to you.

-----Original Message-----

From: Vicki Gordon Kaufman [mailto:vkaufman@moylelaw.com]
Sent: Thursday, September 15, 2005 1:04 PM
To: Mays, Meredith
Cc: White, Nancy
Subject: 041269 -- Telepak
Importance: High

Meredith: I have just been informed re the Telepax subpoena. We will be filing a motion to quash; however, can we arrange to provide you with a letter (as you suggested earlier) and how can be sure the info will be kept confidential?

Vicki Gordon Kaufman
Moyle, Flanigan, Katz, Raymond & Sheehan, P.A.
118 N. Gadsden Street
Tallahassee FL 32301
Phone: (850) 681-3828
Fax: (850) 681-8788
vkaufman@moylelaw.com

Tax Advice Disclosure: To ensure compliance with requirements imposed by the IRS under Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments), unless otherwise specifically stated, was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any matters addressed herein.

The information contained in this electronic mail transmission may be attorney/client privileged and confidential. It is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone collect at 561-659-7500. Thank you.

CONFIDENTIAL

FILED

SEP 16 2005

BEFORE THE
MISSISSIPPI PUBLIC SERVICE COMMISSION

MISS. PUBLIC SERVICE
COMMISSION

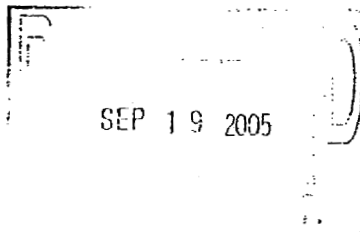
DOCKET NO. 2005-AD-139

IN RE: ORDER ESTABLISHING
GENERIC DOCKET TO CONSIDER
CHANGE-OF-LAW TO EXISTING
INTERCONNECTION AGREEMENTS

TELEPAK NETWORKS, INC.'S RESPONSE TO BELL SOUTH
TELECOMMUNICATIONS, INC.'S FIRST REQUESTS FOR ADMISSION

Telepak Networks, Inc. ("Telepak") hereby serves its responses to BellSouth
Telecommunications, Inc.'s ("BellSouth") first requests for admission.

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



RESPONSE:

Respectfully submitted this 16th day of September, 2005.

CHARLES L. McBRIDE, JR.
BRUNINI, GRANTHAM, GROWER & HEWES, PLLC
1400 East Trustmark Building
248 East Capital Street (39201)
Post Office Drawer 119
Jackson, Mississippi 39205-0119
Telephone: (601) 948-3101
Facsimile: (601) 960-6902

CONFIDENTIAL

CERTIFICATE OF SERVICE

I, Charles L. McBride, Jr., attorney of record for Telepak Networks, Inc. ("Telepak"), hereby certify that I have this day caused to be hand-delivered the original and fourteen (14) copies of the above and foregoing Response to Brian U. Ray, Executive Secretary of the Mississippi Public Service Commission, Woolfolk State Office Building, 501 North West Street, Suite 201-A, Jackson, Mississippi 39201.

I have also caused to be mailed by United States mail, postage prepaid, a true and correct copy of the Response to the following parties who have previously intervened in this docket:

ATTORNEY FOR BELLSOUTH TELECOMMUNICATIONS, INC.

Thomas B. Alexander, Esq.
General Counsel-Mississippi
Suite 790, Landmark Center
175 E. Capitol Street
Jackson, MS 39201

ATTORNEY FOR ITC^DELTACOM COMMUNICATIONS, INC.

James L. Halford, Esq.
Brunini, Grantham, Grower & Hewes, PLLC
Post Office Drawer 119
Jackson, Mississippi 39205

ATTORNEYS FOR SOUTHERN TELECOMMUNICATIONS COMPANY, LLC,
COMMUNIGROUP OF JACKSON, INC. D/B/A COMMUNIGROUP, XPHONE
USA, INC. D/B/A EXPETEL COMMUNICATIONS, AND IMAGE ACCESS, INC.
D/B/A NEWPHONE

Stanley Q. Smith, Esq.
J. Andrew Gipson, Esq.
Watkins Ludlum Winter & Stennis
Post Office Box 427
Jackson, Mississippi 39205-0427

CONFIDENTIAL

**ATTORNEY FOR NUVOX COMMUNICATIONS INC., XSPEDIUS
MANAGEMENT CO. SWITCHED SERVICES, LLC, AND XSPEDIUS
MANAGEMENT CO. OF JACKSON, LLC**

Robert P. Wise, Esq.
Wise Carter Child & Caraway
Post Office Box 651
Jackson, Mississippi 39205

**ATTORNEY FOR SOUTHEASTERN COMPETITIVE CARRIERS
ASSOCIATION, XO COMMUNICATIONS, INC., AND US LEC, INC.**

Clark Monroe
Dunbar Monroe, PLLC
1855 Lakeland Drive, Suite R-201
Jackson, MS 39216

Charles B. Welch, Jr.
Farris, Matthews, Branam, Bobango & Hellen, P.L.C.
618 Church Street, Suite 300
Nashville, Tennessee 37219

ATTORNEYS FOR SPRINT COMMUNICATIONS COMPANY, L.P.

Robert P. Wise, Esq.
Wise Carter Child & Caraway
Post Office Box 651
Jackson, Mississippi 39205

Edward Phillips
Sprint Communications Company, L.P.
14111 Capital Boulevard
Mailstop NCWKFR0313
Wake Forest, North Carolina 27587-5900

ATTORNEY FOR MEGAGATE BROADBAND, INC.

Robert P. Wise, Esq.
Wise Carter Child & Caraway
Post Office Box 651
Jackson, Mississippi 39205

DIXIE-NET COMMUNICATIONS, INC.

Chris Marsalis
Vice President/Operations

CONFIDENTIAL

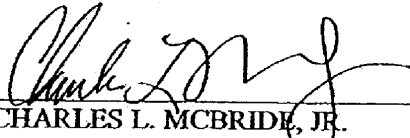
Dixie-Net
301 North Main Street
Ripley, Mississippi 38663

ATTORNEYS FOR COMPETITIVE CARRIERS OF THE SOUTH, INC.

Robert P. Wise, Esq.
Wise Carter Child & Caraway
Post Office Box 651
Jackson, Mississippi 39205

Bill Magness
CASEY, GENTZ & MAGNESS L.L.P.
98 San Jacinto Blvd., Suite 1400
Austin, Texas 78701

This, the 16th day of September, 2005.



CHARLES L. MCBRIDE, JR.

CONFIDENTIAL

-----Original Message-----

From: Mays, Meredith
Sent: Wednesday, August 24, 2005 2:49 PM
To: Charlie Gerkin; 'dshaffer@xo.com'
Subject: One more question on XO/Allegiance

1
2
3
4
5

First and foremost, I appreciate you all working through this with us. I have yet another question on the discovery we received from you as it relates to [REDACTED] I understand that in [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Clear as mud?


Meredith

CONFIDENTIAL

-----Original Message-----

From: Charlie Gerkin [mailto:cgerkin@fh2.com]
Sent: Wednesday, August 24, 2005 3:08 PM
To: Mays, Meredith
Subject: RE: One more question on XO/Allegiance

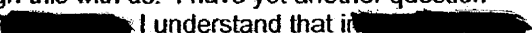

Meredith,



Charles V. Gerkin, Jr.
Friend, Hudak & Harris, LLP
Three Ravinia Drive, Suite 1450
Atlanta, Georgia 30346
Tel: 770-399-9500
Fax: 770-234-5965
E-mail: cgerkin@fh2.com

**NOTE: This message is intended only for the designated recipient(s). It may contain confidential or proprietary information and may be subject to the attorney-client privilege or other confidentiality protections. If you are not a designated recipient, you may not review, copy or distribute this message. If you receive this message in error, please notify the sender by reply e-mail and delete this message.

From: Mays, Meredith [mailto:Meredith.Mays@BellSouth.COM]
Sent: Wednesday, August 24, 2005 2:49 PM
To: Charlie Gerkin; dshaffer@xo.com
Subject: One more question on XO/Allegiance

First and foremost, I appreciate you all working through this with us. I have yet another question on the discovery we received from you as it relates to  I understand that it 



Clear as mud?

Meredith

"The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any

CONFIDENTIAL

review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers." 118

CONFIDENTIAL

-----Original Message-----

From: Shaffer, Dana [mailto:dana.shaffer@xo.com]
Sent: Monday, September 26, 2005 3:18 PM
To: Mays, Meredith
Cc: Charlie Gerkin
Subject: RE: 041269-TL BellSouth Discovery to XO

I will double check again, and let you know.

If we confirm that we have provided all that we have, would you be willing to withdraw the request in FL?

-----Original Message-----

From: Mays, Meredith [mailto:Meredith.Mays@bellsouth.com]
Sent: Monday, September 26, 2005 2:04 PM
To: Shaffer, Dana
Cc: Charlie Gerkin
Subject: RE: 041269-TL BellSouth Discovery to XO

No. Just being thorough.

-----Original Message-----

From: Shaffer, Dana [mailto:dana.shaffer@xo.com]
Sent: Monday, September 26, 2005 2:14 PM
To: Mays, Meredith
Cc: Charlie Gerkin
Subject: FW: 041269-TL BellSouth Discovery to XO

Meredith -- we have, to the best of my knowledge, provided all the info on collocations that we have. Do you have any indication that we haven't?

Please let me know.

thanks --
Dana

-----Original Message-----

From: Barclay, Lynn [mailto:Lynn.Barclay@bellsouth.com]
Sent: Monday, September 26, 2005 12:44 PM
To: Shaffer, Dana; Kenneth A. Hoffman; Martin P. McDonnell
Cc: Holland, Robyn P; Fatool, Vicki; Hobbs, Linda
Subject: 041269-TL BellSouth Discovery to XO

Sent on Behalf of Meredith Mays:

Please see the attached. A hard copy will be sent via U.S. Mail.

<<041269 1st Set of Interrogatories to XO.pdf>>

Lynn Barclay
Legal Department

CVD1stSuppPODNo1000178

CONFIDENTIAL

**675 West Peachtree Street
Suite 4300
Atlanta, GA 30375
404 335-0788**

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers. 162