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BellSouth Telecommunications, Inc.
FL Dkt. No. 041269-TP
Covad's 1st Request for Production
August 18, 2005
4th SUPPLEMENTAL Item No. 1
ATTACHMENT

PROPRIETARY

DOCUMENT NUMBER-DATE

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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

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DIRECTOR-REG. RELATIONS
TALLAHASSEE, FL

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NETWORK TELEPHONE CORPORATION'S SUPPLEMENTAL RESPONSE TO
BELLSOUTH'S INTERROGATORY NO. 2

Network Telephone Corporation (NTC), pursuant to rule 28.106-206, Florida Administrative Code, rule 1.340, Florida Rules of Civil Procedure, and Order No. PSC-05-0736-PCO-TP, hereby responds to BellSouth Telecommunications, Inc.'s (BellSouth) Interrogatory No. 2.

INTERROGATORY

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

SUPPLEMENTAL RESPONSE:

The response is confidential and thus has been redacted.

s/ Vicki Gordon Kaufman

Vicki Gordon Kaufman

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Docket No. 041269-TP

**NTC Supplemental Response
To BellSouth
Interrogatory No. 2
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CERTIFICATE OF SERVICE

Docket No. 041269-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing Supplemental Response to BellSouth's Interrogatory No. 2 was served via (*) hand delivery or electronic mail and first class United States mail this 25th day of October, 2005, to the following:

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Vicki Gordon Kaufman

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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

NUVOX'S OBJECTIONS AND SUPPLEMENTAL RESPONSES TO BELL SOUTH'S FIRST SET OF INTERROGATORIES (NOS. 1 - 3)

NuVox Communications Inc. ("NuVox") hereby provides supplemental responses to BellSouth's First Set of Interrogatories to NuVox. The supplemental answers to these interrogatories were provided by Susan J. Berlin, Vice President, Senior Regulatory Counsel of NuVox.

OBJECTIONS

1. NuVox object to each and every Interrogatory to the extent that it seeks production of information that is protected from disclosure by the attorney work product privilege, attorney-client communication privilege, or other applicable privilege or to the extent it requires disclosure of proprietary confidential business information exempt from disclosure pursuant to Section 364.183, Florida Statutes.
2. NuVox object to each and every Interrogatory to the extent that it seeks production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.
3. NuVox object to each and every Interrogatory to the extent that it is vague, overly broad, or contains undefined terms susceptible to multiple meanings.
4. NuVox object to each and every Interrogatory to the extent that it seeks production of information that is a matter of public record, for example, documents that have been filed with a government agency.

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5. NuVox object to each and every Interrogatory to the extent that it seeks production of information that is not in the possession, custody, or control of the NuVox.
6. NuVox object to each and every Interrogatory to the extent that it seeks information for an indeterminate period of time and is thus overly broad and unduly burdensome. NuVox will provide non-privileged information that is responsive to the issue to which the Interrogatory responds.
7. NuVox object to each and every Interrogatory to the extent that it imposes a burden of discovery not required in the Rules of Civil Procedure.
8. NuVox object to each and every Interrogatory to the extent that it is unduly burdensome, expensive, or oppressive to respond to as presently written, particularly where an Interrogatory seeks information regarding "all" instances or examples.
9. NuVox subsequent responses to Interrogatories shall not be deemed an admission as to the relevance or materiality of any of the information sought therein. As discovery is ongoing in this matter, NuVox reserve the right to supplement and update these responses.

INTERROGATORIES AND RESPONSES

1. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee wherein NuVox is a fiber-based collocater that were not previously listed in BellSouth's First Request for Admissions served upon NuVox in North Carolina. If you have previously furnished this information, on an informal basis, it is not necessary to duplicate that response.

Supplemental 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 NuVox has an active collocation arrangement(s) and obtains fiber or fiber capacity from another entity that is not BellSouth, whether or not NuVox considers such arrangements to

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qualify as “fiber-based collocation” pursuant to the FCC’s definition. Please describe with specificity the manner in which NuVox obtains fiber. If NuVox contends that it is not a fiber based collocator in any such wire center, please explain with specificity the basis for this contention.

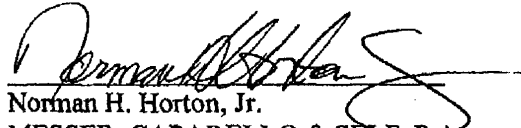
Supplemental Response:

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

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Supplemental Response:

Respectfully submitted this 25th day of October, 2005.



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