

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition of TDS Telecom d/b/a)
TDS Telecom/Quincy Telephone, ALLTEL)
Florida, Inc., Northeast Florida Telephone)
Company d/b/a NEFCOM, GTC, Inc. d/b/a)
GT Com, Smart City Telecommunications,)
LLC d/b/a Smart City Telecom, ITS Tele-)
communications Systems, Inc. and Frontier)
Communications of the South, LLC,)
("Joint Petitioner") objecting to and)
requesting suspension of Proposed Transit)
Traffic Service Tariff filed by BellSouth)
Telecommunications, Inc.)
_____)

Docket Nos. 050119-TP and 050125-TP

**SMALL LOCAL EXCHANGE TELECOMMUNICATIONS
COMPANIES' FIRST SET OF INTERROGATORIES
TO BELLSOUTH TELECOMMUNICATIONS, INC.**

TDS Telecom, d/b/a TDS Telecom/Quincy Telephone, Northeast Florida Telephone Company, d/b/a NEFCOM, GTC, Inc. d/b/a GT Com, Smart City Telecommunications, LLC d/b/a Smart City Telecom and Frontier Communications of the South, LLC ("Small LECs") hereby propounds the following interrogatories on BellSouth Telecommunications, Inc.. ("BellSouth") and requests that they be answered separately, fully and under oath within thirty (30) days as required by Rule 28-106.206, Florida Administrative Code, and Rule 1.340(a), Florida Rules of Civil Procedure.

GENERAL INSTRUCTIONS

1. Each interrogatory shall be answered in full.
2. If any of the following interrogatories cannot be answered in full after exercising due diligence to secure the information, please so state and answer to the extent possible, specifying your inability to answer the remainder, and state whatever information you have concerning the unanswered portion. If your answer is qualified or limited in any respect, please set forth the details

of such qualifications and/or limitations.

3. If you object to fully identifying a document or oral communication because of a privilege, you must nevertheless provide the following information, unless divulging the information would disclose the privileged information: (a) the nature of the privilege claimed (including work product); (b) the date of the document or oral communication; (c) if a document; its type (correspondence, memorandum, facsimile electronic mail, etc.), custodian, location, and such other information sufficient to identify the document for a subpoena duces tecum or a document request, including where appropriate the author, the addressee, and, if not apparent, the relationship between the author and addressee; (d) if an oral communication; the place where it was made, the names of the persons present while it was made, and, if not apparent, the relationship of the persons present to the declarant; and (e) the general subject matter of the document or the oral communication.

4. If you object to all or part of any interrogatory and refuse to answer that part, state your objection, identify the part to which you are objecting, and answer the remaining portion of the interrogatory.

5. Whenever an interrogatory calls for information that is not available to you in the form requested, but is available in another form, or can be obtained at least in part from other data in your possession, so state and either supply the information requested in the form in which it is available, or supply the data from which the information requested can be obtained.

6. The singular shall include the plural and vice versa; the terms "and" and "or" shall be both conjunctive and disjunctive; and the term "including" means "including without limitation."

7. These interrogatories shall be answered under oath by you or through your agent who is qualified to answer and who shall be fully identified, with said answers being served as provided pursuant to the Florida Rules of Civil Procedure.

DEFINITIONS

1. As used herein, the terms "you," "your" or "yourself" refers to BellSouth Telecommunications, Inc. ("BellSouth"), along with any and all agents, employees, servants, officers, directors, attorneys or other persons acting or purporting to act on BellSouth's behalf.

2. As used herein, the term "Small LEC" or "Small LECs" refers to, individually or in the aggregate, TDS Telecom, d/b/a TDS Telecom/Quincy Telephone, Northeast Florida Telephone Company, d/b/a NEFCOM, GTC, Inc. d/b/a GT Com, Smart City Telecommunications, LLC d/b/a Smart City Telecom and Frontier Communications of the South, LLC.

3. As used herein, the term "person" means any natural individual in any capacity whatsoever or any entity or organization, including divisions, departments and other units therein, and shall include, but not be limited to, a public or private corporation, partnership, joint venture,

voluntary or unincorporated association, organization, proprietorship, trust, estate, governmental agency, commission, bureau, board or department.

4. As used herein, the term "document" means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, the original and each copy, regardless of origin and location, of any book, pamphlet, periodical, letter, electronic mail, memorandum (including any memorandum or report of a meeting or conversation), invoice, bill, order form, receipt, financial statement, accounting entry, diary, calendar, telex, telegram, cable, report, record, contract, agreement, study, handwritten note, draft, working paper, chart, paper, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced, which is in your possession, custody or control or which was, but is no longer, in your possession, custody or control.

5. As used herein, the term "communication" means any oral or written utterance, notation or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, correspondence, conversations, dialogues, discussions, interviews, consultations, agreements and other understandings between or among two or more persons.

6. "Identify" shall mean to denote, list, state, or respond in similar fashion. "Identify" shall also mean: (a) when used with respect to a person, to state the person's full name, present or last known business address; and present or last known employer and position; **(b) when used in respect to a document, to describe the document by character (e.g., letter, report, memorandum, etc.), author, date, and to state its present location and custodian;** and (c) when used with respect to an oral communication, to identify the persons making and receiving the communication, the approximate date of and time of the communication, and a summary of its content or substance.

7. "Relate to" shall mean contain, discuss, describe or address.

8. "All" means all or any.

INTERROGATORIES

1. For each individual Small LEC, please provide a list of the third-party carriers to whom BellSouth provides intermediary transit tandem switching and transport for traffic that: (a) originates from such third-party carriers and terminates to any of the individual Small LECs described above; or (b) originates from any of the individual Small LECs described above and terminates to any such third party carriers.

2. For each individual Small LEC, please indicate or describe, for each third-party carrier listed in BellSouth's response to Interrogatory No. 1, the manner in which BellSouth delivers such third-party traffic to the specific Small LEC (i.e., from which BellSouth tandem, over which trunk group, to which tandem or end office(s) of the Small LEC the traffic is delivered).

3. For each third-party carrier listed in BellSouth's response to Interrogatory No. 1, please provide the date (or approximate date) on which BellSouth began to provide intermediary tandem switching and transport for delivery of those third-party carriers' traffic to Small Local Exchange Companies, including the Small LECs as defined in these Interrogatories.

4. For each third-party carrier listed in BellSouth's response to Interrogatory No. 1, provide specific details about what call records BellSouth obtains and is capable of providing to other carriers for third-party traffic that BellSouth switches and delivers to the Small LECs. Please provide a detailed explanation of the individual record fields and what information is represented in each record field. For each record field for which BellSouth populates information at its tandem switch during the process of transiting third-party carriers' traffic, indicate what information BellSouth inserts in such field and an explanation of what that information is intended to convey.

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, personally appeared _____, as _____ of _____

is personally known to me or who has produced a Florida driver's license as identification and who did take an oath, did depose and say that he/she did execute the foregoing Answers to City of Cape Coral's First Set of Interrogatories to Greater Pine Island Water Association, Inc. and that the same are true, accurate and correct to the best of his/her knowledge, information and belief.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 2005.

Notary Public

Typed, Printed or Stamped Name

My Commission Expires: