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February 22, 2006

VIA ELECTRONIC and U.S. MAIL

Ms. Blanca S. Bayo
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

DISTRIBUTION CENTER
06 FEB 24 AM 8:48


RE: Docket No. 050119-TP: Joint petition by 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 Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC ["Joint Petitioners"] objecting to and requesting suspension and cancellation of proposed transit traffic service tariff filed by BellSouth Telecommunications, Inc.

Docket No. 05125-TP: Petition and complaint for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc., by AT&T Communications of the Southern States, LLC.

Dear Ms. Bayo:

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC _____
- OTH _____

Today, Verizon Wireless served its First Set of Interrogatories (Nos. 1 & 2) to BellSouth Telecommunications, Inc. in the captioned docket.

Sincerely,


Charles F. Palmer

- CFP/jab
- Enclosures
- cc: All Parties of Record

CERTIFICATE OF SERVICE
Docket Nos. 050119-TP and 050125-TP

I HEREBY CERTIFY that a true and correct copy of Verizon Wireless' First Set of Interrogatories (Nos. 1 & 2) to BellSouth Telecommunications, Inc. has been served by Electronic Mail and U.S. mail this 22nd day of February 2006 to the following:

Florida Public Service Commission Jason Rojas 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850	Blooston Law Firm Benjamin H. Dickens, Esq. 2120 L Street, NW Suite 300 Washington, DC 20037
Florida Public Service Commission Felicia Banks 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850	Frontier Communications of the South, Inc. Ms. Angie McCall 300 Bland Street Bluefield, WV 24701-3020
Florida Public Service Commission Laura King/ Paul Vickery 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850	GT Com Mr. Mark Beightol P. O. Box 220 Port St. Joe, FL 32457-0220
ALLTEL Stephen B. Rowell/Bettye Willis One Allied Drive, B5F11 Little Rock, AR 72202	ITS Telecommunications Systems, Inc. Mr. Robert M. Post, Jr. P. O. Box 277 Indiantown, FL 34956-0277
ALLTEL Florida, Inc. Mr. James White 6867 Southpoint Drive, N., Suite 103 Jacksonville, FL 32216-8005	NEFCOM Ms. Deborah Nobles 505 Plaza Circle, Suite 200 Orange Park, FL 32073-9409
AT&T Communications of the Southern States, LLC, Tracy Hatch 101 North Monroe Street, Suite 700 Tallahassee, FL 32301-1549	Rutledge Law Firm Ken Hoffman/Martin McDonnell/M. Rule P.O. Box 551 Tallahassee, FL 32302-0551
Ausley Law Firm J. Jeffery Wahlen P.O. Box 391 Tallahassee, FL 32302	Smart City Telecom P. O. Box 22555 Lake Buena Vista, FL 32830-2555
Messer Law Firm Floyd R. Self P.O. Box 1876 Tallahassee, FL 32302-1876	T-Mobile USA, Inc. Michele K. Thomas 60 Wells Avenue Newton, MA 02459

BellSouth Telecommunications, Inc.
Nancy B. White/R. D. Lackey/M. Mays
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

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Three Ravinia Drive, Suite 1450
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Ronald W. Gavillet
One South Wacker, Suite 200
Chicago, IL 60606

NuVox Communications, Inc.
Susan J. Berlin
Two North Main Street
Greenville, SC 29601

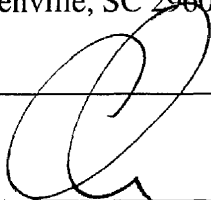
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February 22, 2006

VIA ELECTRONIC and U.S. MAIL

Mr. Manuel A. Gurdian, Esq.
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, FL 32301

RE: Docket No. 050119-TP: Joint petition by 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 Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC ["Joint Petitioners"] objecting to and requesting suspension and cancellation of proposed transit traffic service tariff filed by BellSouth Telecommunications, Inc.

Docket No. 05125-TP: Petition and complaint for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc., by AT&T Communications of the Southern States, LLC.

Dear Mr. Gurdian:

Enclosed is a copy of Verizon Wireless' First Set of Interrogatories (Nos. 1 & 2) to BellSouth Telecommunications, Inc. in the captioned docket.

Sincerely,



Charles F. Palmer

CFP/jab
Enclosures
cc: All Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint petition by 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 Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC ["Joint Petitioners"] objecting to and requesting suspension and cancellation of proposed transit traffic service tariff filed by BellSouth Telecommunications, Inc.

DOCKET NO. 050119-TP

In re: Petition and complaint for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc., by AT&T Communications of the Southern States, LLC.

DOCKET NO. 050125-TP

DATED: FEBRUARY 22, 2006

VERIZON WIRELESS' FIRST SET OF INTERROGATORIES (NOS. 1 & 2) TO BELL SOUTH TELECOMMUNICATIONS, INC.

Verizon Wireless, pursuant to Rule 28.106-206, Florida Administrative Code and the Florida Rules of Civil Procedure, hereby serves its First Set of Interrogatories ("Interrogatories") to BellSouth Telecommunications, Inc. ("BellSouth") to be answered under oath, within the time period set forth in Order No. PSC-05-1206-PCO-TP.

INSTRUCTIONS

(a) If any response required by way of answer to these interrogatories is considered to contain confidential or protected information, please furnish this information subject to a protective agreement.

(b) If any response required by way of answer to these Interrogatories is withheld

under a claim of privilege, please identify the privilege asserted and describe the basis for such assertion. If any document is withheld under a claim of privilege, please furnish a list of each document for which the privilege is claimed, reflecting the name and address of the person who prepared the document, the date the document was prepared, each person who was sent a copy of the document, each person who has viewed or who has had custody of a copy of the document, and a statement of the basis on which the privilege was claimed.

(c) These Interrogatories are to be answered with reference to all information in your possession, custody, or control or reasonably available to you.

(d) If any Interrogatory cannot be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of an Interrogatory, answer all parts of the Interrogatory to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

(e) These Interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your response to these Interrogatories subsequently become known or should your initial response be incorrect or untrue.

DEFINITIONS

(a) "You", "your", "Company" or "BellSouth" refers to BellSouth Telecommunications, Inc., its employees and authorized agents.

(b) "Document" refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

(c) "Identify" means: (i) with respect to a person, to state the person's name, address and business relationship (e.g., "employee") to the Company; or (b) with respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

INTERROGATORIES

INTERROGATORY NO. 1: Please identify all persons by name, address, and employer participating in the preparation of the answers to these Interrogatories or supplying information used in connection therewith.

INTERROGATORY NO. 2: Please identify, individually, the specific name and level of all tandem switching and common transport rate elements in BellSouth's interstate access tariff.

AFFIDAVIT

STATE OF FLORIDA)

COUNTY OF _____)

I hereby certify that on this _____ day of _____, 2006, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared _____, who is personally known to me, and he/she acknowledged before me that he/she provided the answers to interrogatory number(s) _____ from VERIZON WIRELESS' FIRST SET OF INTERROGATORIES (NOS. 1 & 2) TO BELLSOUTH TELECOMMUNICATIONS, INC. in Docket No(s). 050119-TP, 050125-TP, and that the responses are true and correct based on his/her personal knowledge.


In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this _____ day of _____, 2006.

Notary Public
State of Florida, at Large

My Commission Expires:

Respectfully submitted this 22nd day of February, 2006.

VERIZON WIRELESS



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202-589-3756
elaine.critides@verizonwireless.com

CERTIFICATE OF SERVICE
Docket Nos. 050119-TP and 050125-TP

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<p>ALLTEL Stephen B. Rowell/Betty Willis One Allied Drive, B5F11 Little Rock, AR 72202</p>	<p>ITS Telecommunications Systems, Inc. Mr. Robert M. Post, Jr. P. O. Box 277 Indiantown, FL 34956-0277</p>
<p>ALLTEL Florida, Inc. Mr. James White 6867 Southpoint Drive, N., Suite 103 Jacksonville, FL 32216-8005</p>	<p>NEFCOM Ms. Deborah Nobles 505 Plaza Circle, Suite 200 Orange Park, FL 32073-9409</p>
<p>AT&T Communications of the Southern States, LLC, Tracy Hatch 101 North Monroe Street, Suite 700 Tallahassee, FL 32301-1549</p>	<p>Rutledge Law Firm Ken Hoffman/Martin McDonnell/M. Rule P.O. Box 551 Tallahassee, FL 32302-0551</p>
<p>Ausley Law Firm J. Jeffery Wahlen P.O. Box 391 Tallahassee, FL 32302</p>	<p>Smart City Telecom P. O. Box 22555 Lake Buena Vista, FL 32830-2555</p>
<p>Messer Law Firm Floyd R. Self P.O. Box 1876 Tallahassee, FL 32302-1876</p>	<p>T-Mobile USA, Inc. Michele K. Thomas 60 Wells Avenue Newton, MA 02459</p>

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