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Sent: Wednesday, March 01, 2006 4:00 PM
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Subject: E-filing - Docket Nos. 050119-TP and 050125-TP
Attachments: Motion to Compel 03.01.06.pdf

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Docket Nos. and titles: 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 Telecommunications Systems, Inc. and Frontier Communications of the South, LLC, concerning BellSouth Telecommunications, Inc.'s Transit Service Tariff
 Docket No. 050119-TP

Petition and Complaint of AT&T Communication of the Southern States, LLC for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc.
 Docket No. 050125-TP

Filed on behalf of: MetroPCS California/Florida, Inc. (MetroPCS),

Number of pages: 26

Document attached: Motion to Compel Responses to Interrogatories by BellSouth Telecommunications, Inc.

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FPSC-COMMISSION CI FRK

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 Telecommunications 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 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

Filed: March 1, 2006

**MetroPCS California/Florida, Inc.'s
Motion to Compel Responses to Interrogatories by
BellSouth Telecommunications, Inc.**

MetroPCS California/Florida, Inc. ("MetroPCS"), pursuant to rule 28-106.303, Florida Administrative Code, files this Motion to Compel BellSouth Telecommunications, Inc. ("BellSouth") to respond to MetroPCS's First Set of Interrogatories (Nos. 3 and 5). As grounds for the motion, MetroPCS states:

1. On January 27, 2006, MetroPCS, pursuant to Rule 1.340, Florida Rules of Civil Procedure, and Rule 28-106.206, Florida Administrative Code, served its First Set of Interrogatories (Nos. 1-12) to BellSouth.

2. Interrogatory No. 3 asked BellSouth:

Please refer to Exhibit KRM-2 to the direct testimony of BellSouth witness Kenneth McCallen. For each of the CLECs identified in that exhibit, please state the number of minutes of transit traffic delivered by such CLEC to BellSouth in Florida during

each month beginning with the effective date of the "Total Transit Charges" identified for that CLEC in such exhibit through the most recent month for which such data are available.

3. Interrogatory No. 4 asked BellSouth:

Please identify each and every CLEC with which BellSouth has a currently effective interconnection agreement in Florida that provides for "Total Transit Charges" of less than \$0.0023 per MOU, and for each such CLEC, state the "Total Transit Charges" and the effective date of the interconnection agreement. In other words, please provide the same information as that contained in Exhibit KRM-2 to the direct testimony of BellSouth witness Kenneth McCallen for each CLEC with which BellSouth has a currently effective Florida interconnection agreement that is not identified on such Exhibit.

4. Interrogatory No. 5 asked BellSouth:

For each CLEC identified in your response to Interrogatory No. 4, please state the number of minutes of transit traffic delivered by such CLEC to BellSouth in Florida during each month beginning with the effective date of the "Total Transit Charges" identified for that CLEC in your response to Interrogatory No. 4 through the most recent month for which such data are available.

5. On February 16, 2006, BellSouth served responses and General and Specific Objections to MetroPCS's First Set of Interrogatories (Nos. 1-12) and MetroPCS's First Set of Requests for Production of Documents (Nos. 1-4).

6. BellSouth objected to MetroPCS's Interrogatory Nos. 1 and 2 on relevance grounds. MetroPCS does not concede that the information sought by MetroPCS's Interrogatory Nos. 1 and 2 "is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this docket" as asserted by BellSouth, but MetroPCS does not seek to compel responses to Interrogatory Nos. 1 and 2 at this time. MetroPCS reserves the right to move to compel responses to Interrogatory Nos. 1 and 2 after the Florida Public Service Commission ("Commission") rules that BellSouth's charges for transit service must be based upon cost.

7. BellSouth made the following specific objection to MetroPCS's Interrogatory No. 3:¹

BellSouth objects to Interrogatory No. 3 on the grounds it is unduly burdensome, overly broad, and oppressive as written, particularly as MetroPCS is requesting information on a total of two hundred and five (205) CLECs for an average period of three years. In addition, the information MetroPCS has requested is not readily available because BellSouth does not have a mechanized inventory system from which such information could be extracted. BellSouth also objects to this interrogatory to the extent it seeks the unauthorized disclosure of confidential information subject to the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007. BellSouth will only provide CPNI consistent with the FCC's rules. Subject to, and without waiving the foregoing objections, the specific information requested by MetroPCS is not readily available.

8. BellSouth made the following specific objection to MetroPCS's Interrogatory No. 5:

BellSouth objects to Interrogatory No. 5 on the grounds it is unduly burdensome, overly broad, and oppressive as written, particularly as MetroPCS is requesting information on a total of two hundred and five (205) [*sic*] CLECs for an average period of three years. In addition, the information MetroPCS has requested is not readily available because BellSouth does not have a mechanized inventory system from which such information could be extracted. BellSouth also objects to this interrogatory to the extent it seeks the unauthorized disclosure of confidential information subject to the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007. BellSouth will only provide CPNI consistent with the FCC's rules. Subject to, and without waiving the foregoing objections, the specific information requested by MetroPCS is not readily available.

9. As an initial matter, it is important to note that BellSouth has not objected to the relevance of the information sought in Interrogatory Nos. 3 and 5 to the matter before the Commission. This information is critical to MetroPCS's demonstration that most of the CLECs who BellSouth asserts have agreed to pay its Transit Intermediary Charge do not originate enough transit traffic to justify the cost of resisting BellSouth's demand. It is also important to note that this information is available *only* from BellSouth. MetroPCS can obtain it from no other source.

¹ BellSouth included eleven (11) "General Objections" in its responses to MetroPCS's First Set of Interrogatories. None of these "general" objections (other than number 8, which replicates part of BellSouth's "specific" objections to MetroPCS's Interrogatory Nos. 3 and 5) are related to MetroPCS's Interrogatory Nos. 3 and 5.

10. BellSouth's objection to providing the information has two grounds: 1) that the requests are burdensome, and 2) that response would require BellSouth to reveal CPNI information. Both grounds are without merit as discussed below.

11. The primary basis for BellSouth's objection appears to be that "MetroPCS is requesting information on a total of two hundred and five (205) CLECs for an average period of three years."²

12. In order to attempt to resolve this dispute without Commission involvement, counsel for MetroPCS conferred with counsel for BellSouth. MetroPCS has agreed to accept significantly less information in response to MetroPCS's Interrogatory Nos. 3 and 5 than it originally requested.³ Specifically, counsel for MetroPCS has agreed that, rather than providing MetroPCS the "number of minutes of transit traffic delivered by [each] such CLEC to BellSouth in Florida during each month beginning with the effective date of the 'Total Transit Charges' identified for that CLEC ... through the most recent month for which such data are available," BellSouth could provide only the number of minutes of transit traffic delivered by each CLEC for a *single month*, viz ., November, 2005, if BellSouth also provided the number of transit minutes delivered to BellSouth by MetroPCS in the same month. MetroPCS's counsel also advised BellSouth's counsel that MetroPCS would accept the data with the identities of individual CLECs redacted in order to address BellSouth's concern about the confidentiality of the information (as discussed below), despite the fact that counsel for

² This objection, although asserted *verbatim* by BellSouth with respect to both Interrogatory Nos. 3 and 5, is inapplicable to Interrogatory No. 5 to the extent that BellSouth asserts that "MetroPCS is requesting information on a total of two hundred and five (205) CLECs." Based upon BellSouth's response to MetroPCS's Interrogatory No. 4, Interrogatory No. 5 requests information concerning only nine (9) CLECs.

³ Because MetroPCS has agreed to accept significantly less information and because MetroPCS has agreed that the identities of individual CLECs may be redacted, MetroPCS requests that the Commission make it clear that BellSouth must respond separately to Interrogatory Nos. 3 and 5, which seek information concerning different groups of CLECs.

BellSouth and MetroPCS have executed a Protective Agreement that would prohibit any improper use or disclosure of the information.

13. Despite MetroPCS's willingness to compromise, BellSouth still refuses to respond to this relevant discovery.

14. BellSouth claims that it "does not have a mechanized inventory system from which such information could be extracted." This, however, does not make the request burdensome. Further, MetroPCS's request, as narrowed by its counsel, will require significantly less effort on BellSouth's part than the monthly reports that BellSouth files in Georgia Public Service Commission ("GPSC") Docket No. 16772-U. In that docket, BellSouth *volunteered* to file a report each month showing the number of transit minutes originated by each CLEC in Georgia to each incumbent local exchange carrier ("ILEC") in Georgia other than BellSouth. *See Order on the Payment of Termination Charges and Centralized Reporting*, GPSC Docket No. 16772-U (adopted August 16, 2005) at 2 ("BellSouth proposes that it file the monthly traffic data BellSouth shall report the required monthly traffic information for all CLECs and ILECs on an aggregate basis")⁴ A true and correct copy of BellSouth's filing in that docket for November, 2005 is attached hereto as Exhibit B.

15. In its monthly filings in GPSC Docket No. 16772-U, BellSouth reports *separately* the number of minutes of transit traffic originated by each CLEC to each ILEC other than BellSouth and the number of minutes of transit traffic originated by each ILEC to each CLEC. By contrast, MetroPCS's narrowed request to BellSouth in this docket seeks only the *total* number of transit minutes originated by each Florida CLEC. It does not require BellSouth to identify only the transit

⁴ A true and correct copy of this order, which lacks the GPSC's stationery and signatures because it was printed from the Word file posted on the GPSC's web site, is attached to this motion as Exhibit A.

minutes delivered to ILECs and *separately* report them for each terminating ILEC, as it must do in its Georgia reports. Thus, BellSouth's claim that it would be "unduly burdensome" for it to provide MetroPCS the number of transit minutes originated by each Florida CLEC and by MetroPCS for a single, designated month⁵ must be rejected. BellSouth files significantly more detailed transit traffic reports in GPSC Docket No. 16772-U without any party or the GPSC having requested it to do so. BellSouth's voluntary, monthly Georgia filings establish that its objection that responding to MetroPCS's Interrogatory Nos. 3 and 5, at least as narrowed by counsel for MetroPCS, would be "overly burdensome" is meritless.

16. To the extent that BellSouth's objections to MetroPCS's Interrogatory Nos. 3 and 5 are based upon the assertion that the information sought is "subject to the FCC's Customer Proprietary Network Information ('CPNI') rules" and that "BellSouth will only provide CPNI consistent with the FCC's rules," such a contention is easily disposed of for several reasons.

17. First, BellSouth's objection here is inconsistent with its response to Item No. 1 of the Small LECs' First Set of Interrogatories. That interrogatory asked BellSouth:

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.

18. In its response to the Small LECs' Interrogatory No. 1, BellSouth identified by name each facilities-based CLEC and Meet Point Billed commercial mobile radio service ("CMRS")

⁵ Although counsel for MetroPCS specifically suggested that BellSouth provide the requested data for November, 2005, if for any reason it would be less difficult for BellSouth to provide the requested data for a different, recent month, MetroPCS will instead accept data for any month from July, 2005, through December, 2005, the same months for which BellSouth has filed transit traffic data in GPSC Docket No. 16772-U as of the date of this motion. Because BellSouth's response to Interrogatory No. 1 of the Small LECs' First Set of Interrogatories is based upon November, 2005 data, however, MetroPCS would prefer data for that month.

carrier that exchanged traffic with any of the Small LECs using BellSouth's transit service during the month of November, 2005 and made no objection that the information was CPNI.

19. BellSouth did not hesitate publicly to identify the CLECs and CMRS carriers that delivered at least one transit call to BellSouth for delivery to a Small LEC in November, 2005 or the Small LEC(s) to which those CLECs and CMRS carriers directed transit traffic. If the information sought by MetroPCS's Interrogatory Nos. 3 and 5 is CPNI, the information that BellSouth provided in response to the Small LECs' Interrogatory No. 1 is no less so. Moreover, in its response to the Small LECs' Interrogatory No. 1 BellSouth stated that it was "concerned that company specific information regarding the exchange of information between specific companies may be considered proprietary" and provided additional information concerning those carriers' transit traffic to the Small LECs through a password-protected web site. BellSouth did not, however, assert that any of the information sought by the Small LECs' Interrogatory No. 1 was CPNI.

20. Second, to the extent that there is any merit to BellSouth's assertion that MetroPCS's Interrogatory Nos. 3 and 5 request CPNI, the Protective Agreement between BellSouth and MetroPCS would prohibit MetroPCS from using or disclosing any such CPNI in a manner inconsistent with the FCC's CPNI rules. Upon information and belief, BellSouth has provided CPNI in discovery responses pursuant to similar protective agreements on numerous occasions, at least when directed to do so by the relevant state commission, including this Commission.

21. Third, in the spirit of compromise, MetroPCS has agreed that BellSouth may redact the identities of individual CLECs, as it does in its Georgia reports, removing any claim that CPNI is implicated.

WHEREFORE, MetroPCS respectfully requests that the Commission grant this motion to compel and require BellSouth immediately to respond in full to Item Nos. 3 and 5 of MetroPCS's

First Set of Interrogatories or, in the alternative, to provide to MetroPCS the aggregate number of transit traffic minutes delivered to BellSouth during the month of November, 2005 by each CLEC in Florida (separately for the CLECs identified in BellSouth's Exhibit KRM-2 and for the CLECs identified in BellSouth's response to MetroPCS's Interrogatory No. 4) and by MetroPCS in Florida, with the identities of the CLECs redacted.

s/Vicki Gordon Kaufman
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MetroPCS's Motion to Compel Responses to Interrogatories by BellSouth
Docket Nos. 050119-TP and 050125-TP
Exhibit A

EXHIBIT A

DOCKET NO. 16772-U

**IN RE: BELLSOUTH TELECOMMUNICATIONS, INC.'S PETITION FOR A
DECLARATORY RULING REGARDING TRANSIT TRAFFIC.**

**ORDER ON THE PAYMENT OF TERMINATION CHARGES
AND CENTRALIZED REPORTING**

This matter comes before the Georgia Public Service Commission ("Commission") on a Request made by Commission Staff to Modify the Commission's previous Order in this docket.

Background

On April 2, 2004, BellSouth Telecommunications, Inc. ("BellSouth") filed a Motion to Adopt CLEC Transit Traffic Proposal. On July 1, 2004, the Commission issued a Procedural and Scheduling Order on BellSouth's Motion. On July 29, 2004, BellSouth and the Georgia Telephone Association ("GTA") filed a Memorandum of Understanding ("MOU"). On September 10, 2004, the Commission issued an Amended Procedural and Scheduling Order seeking testimony on the MOU.

Hearings were held before the Commission on October 5-6, 2004. The Commission issued its Order on Transit Traffic Involving Competitive Local Exchange Carriers and Independent Telephone Companies in this docket on March 24, 2005. On March 29, 2005 Cbeyond Communications, LLC ("Cbeyond") filed a Motion for Clarification ("Motion"), and on April 1, 2005, GTA filed a Petition for Reconsideration ("Petition"). The Commission issued a subsequent Order on Reconsideration and Clarification on April 19, 2005. The Commission Staff hosted an industry workshop on July 12, 2005 to discuss the billing information BellSouth would provide to competitive local exchange companies ("CLECs") and Independent Telephone Companies ("ICOs") pursuant to Paragraph 2 of the MOU as modified in the Commission's Order.

Discussion

Termination Charges

During the course of the industry workshop, BellSouth presented processes that it would use to yield the billing data it would provide to both CLECs and ICOs pursuant to the Commission Order. At the conclusion of the presentation, BellSouth informally requested that as of August 1, 2005, it be allowed to cease paying transit charges on local calls, and implement the procedures presented to enable the end parties to properly bill one another.

Paragraph 4 of the MOU as modified by the Commission requires that "BellSouth . . . provide the same usage information and billing dispute assistance to CLECs as it has agreed to provide to the ICOs." (Order, p. 4). The Order also states that "upon the provisioning of valid billing data, BellSouth will cease payment of termination charges to the ICOs associated with CLEC originated traffic." *Id.* BellSouth has satisfied the requirement outlined in Paragraph 4, and the Commission therefore permits BellSouth to cease paying terminating charges as of September 1, 2005.

Centralized Reporting

BellSouth also made a proposal at the workshop to centralize monthly traffic reporting. BellSouth proposes that it file the monthly traffic data as required by the Order on a CLEC and ILEC aggregate basis. Under the proposal, each CLEC and ILEC will be given a generic alias by BellSouth (such as "CLEC A" or "ILEC 1"). BellSouth, as the primary transit provider, would provide the minutes of use information in aggregate for "CLEC A" to "ILEC 1", and so on. The only issue raised by other industry participants at the workshop was that the confidentiality of the information needed to be maintained.

Based on the industry workshop, the Commission concludes that the proposed "centralized reporting" will continue to provide information in a manner consistent with the original Order in such a way that is more efficient and preserves the confidential treatment of highly-sensitive traffic information. The Order and Order on Reconsideration issued by the Commission requires each LEC to provide its own traffic information. (Order on Reconsideration and Clarification, p. 2). Therefore, the Commission hereby modifies its Orders such that BellSouth shall report the required monthly traffic information for all CLECs and ILECs on an aggregate basis starting September 1st for July 2005 data. Nothing in this order modifies the obligation of the ICOs with regard to filing the NPA/NXXs, grouped by exchange as part of an Extended Area Service or County-wide calling routes, that are considered local calling areas within their service territories in addition to those that are considered local to exchanges in other ICO territories.

WHEREFORE IT IS ORDERED, that the Commission hereby finds that BellSouth has satisfied its requirement to provide valid billing data to the CLECs and ICOs pursuant to

language outlined in the Commission's Initial Order in this docket, and therefore permits BellSouth to cease payment of termination charges on local calls terminated by CLECs or ICOs.

ORDERED FURTHER, that the Commission hereby modifies its Order such that BellSouth shall file the monthly traffic information on behalf of CLECs and ILECs in a manner consistent with the provisions outlined in the body of this Order.

ORDERED FURTHER, that jurisdiction over this proceeding is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion does not stay the effective date of this Order, unless otherwise ordered by the Commission.

The above action of the Commission in Administrative Session on the 16th day of August, 2005.

REECE MCALISTER
EXECUTIVE SECRETARY

ANGELA ELIZABETH SPEIR
CHAIRMAN

DATE

DATE

MetroPCS's Motion to Compel Responses to Interrogatories by BellSouth
Docket Nos. 050119-TP and 050125-TP
Exhibit B

EXHIBIT B



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Lisa S. Foshee
General Counsel - Georgia

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January 3, 2006

DELIVERED BY HAND

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

Re: *BellSouth Telecommunications, Inc.'s Petition for Declaratory Ruling Regarding
Transit Traffic; Docket No. 16772-U*

Dear Mr. McAlister:

Please find enclosed herein for filing an original and three (3) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s Minutes of Use Information for November 2005 pursuant to the Commission's Order on the Payment of Termination Charges and Centralized Reporting dated August 23, 2005. I would appreciate your filing same in the above-referenced proceeding and returning the one (1) extra copy stamped "filed" in the enclosed self-addressed and stamped envelope.

Thank you for your attention to this matter.

Yours very truly,

A handwritten signature in cursive script that reads "Lisa S. Foshee".

Lisa S. Foshee

LSF:nvd
Enclosures

cc: Mr. Leon Bowles (via electronic mail at leonb@psc.state.ga.us)
Mr. John Kaduk (via electronic mail at jkaduk@psc.state.ga.us)
Parties of Record (via electronic mail)

GA PSC FILE NOV05 USAGE CLEC TO FROM ICO .xls
 NOVEMBER 2005 ICO TO CLEC

NOVEMBER 2005 USAGE ICO TO CLEC

Sum of MOU FROM ICO ALIAS	TO CLEC ALIAS														
	CLEC 10	CLEC 11	CLEC 12	CLEC 13	CLEC 14	CLEC 15	CLEC 16	CLEC 17	CLEC 18	CLEC 19	CLEC 2	CLEC 20	CLEC 21	CLEC 22	
ICO 10					10,478			28				63	10		
ICO 11		229			281			265							
ICO 12	3,058				20,239			111			467	166,677	8,265		
ICO 13	1,343				18,422			35			43	54,109	486		
ICO 14					11,298							192,687			
ICO 15		69													
ICO 16	432				760			29			47	190	18		
ICO 17					6,311										
ICO 18	42				9,413			1			11	38,714	39		
ICO 19	70				40,485			124			346	350,316	2,188		
ICO 2		8													
ICO 20		4			18,312			4,494							
ICO 21		295			19,704	3		101,275							
ICO 22		47			54,544			19,954							
ICO 23		9			20,430			2				211,784			
ICO 24					7,541										
ICO 25					108,504							106,915		177	
ICO 26			1,359				118,774		87,538	2,948,146					
ICO 27	487				131,661			19			267	70,489	119		
ICO 28		14			33			85							
ICO 29			486				27,052		38,269	865,024					
ICO 3	1,249			8	919			7			97	1,459	177		
ICO 30	52			2	42,942						20	146,726	23		
ICO 31	1				191			3					54		
ICO 36	95	532,972			2,095,207			17,118			11,802	6,123,324	101,829	399	
ICO 37		923	420		54,607		70,955	25,288	37,674	2,771,030		25,875			
ICO 38					5,171							160,016			
ICO 4		508			12										
ICO 5		3			41			136							
ICO 6		44						23							
ICO 7			512				54,927		34,272	2,340,237					
ICO 8					2,780							291,470			
ICO 9		13			30,981			39,042							
Grand Total	6,829	535,138	2,777	10	2,711,267	3	271,708	208,039	197,753	8,924,437	13,100	7,940,814	113,208	576	

GA PSC FILE NOV05 USAGE CLEC TO FROM ICO .xls
 NOVEMBER 2005 ICO TO CLEC

NOVEMBER 2005 US.

Sum of MOU FROM ICO ALIAS	CLEC 23	CLEC 24	CLEC 25	CLEC 26	CLEC 27	CLEC 28	CLEC 29	CLEC 3	CLEC 30	CLEC 32	CLEC 33	CLEC 34	CLEC 35	CLEC 36
ICO 10	6,300	126	2			47	-				201			
ICO 11	182,754				30	225,285		17,589			988			
ICO 12	603,058	8,413	26,594			512,269	30,780	5	233		3,340		704	608
ICO 13	511,870	1,443	83,408			261,937	836		425		791		79	34
ICO 14						81,489					951			
ICO 15	2,436							27,809			1			
ICO 16	3,519	906	740			541	275	-	49		1,180		49	20
ICO 17	225,765							122			501			
ICO 18	35,979	383	101			18,272	5,304	-	92		459		9	8
ICO 19	999,680	8,045	40,443			1,035,357	11,921		292		2,839		669	390
ICO 2	215					163,351		6,425						
ICO 20	1,255,842				462	96,701		73			1,100			
ICO 21	63,745				53	138		594,221			243			
ICO 22	2,089,441				239	142,076		131			1,673			
ICO 23	329,903					133,233		133,246			293			
ICO 24	200,605							2,233,675			390			
ICO 25	3,156,890	8				182,687	3,145	7,199	38		6,627			
ICO 26				327,035						140,550		7,696		
ICO 27	446,309	2,166	4,463			30,925	38,738	-	147		2,598		1,159	216
ICO 28	930							2,915			19			
ICO 29				1,156,915						199,362		822		
ICO 3	13,923	2,444	5,697			6,264	3,026	-	93		919		153	92
ICO 30	71,972	124	12			166,663	4,063		6		1,151			1
ICO 31	123	49	5			11	4,436		19		35			
ICO 36	14,034,536	142,989	3,817,614		1,512	10,164,987	301,893	3,227,810	3,405		117,810		10,754	4,205
ICO 37	4,572		16,050	326,195				3,688		137,214	55	1,009		
ICO 38	72,306					952					9			
ICO 4	867					1,016		-			3			
ICO 5	5,923					23		1			49			
ICO 6	4,262					792		12			9			
ICO 7				231,883						65,220		1,338		
ICO 8	29,931					521		57,471			100			
ICO 9	1,677,543				1,624	163,481		98			3,257			
Grand Total	26,031,199	167,096	3,995,129	2,042,028	3,920	13,389,018	404,417	6,312,490	4,799	542,346	147,591	10,865	13,576	5,574

GA PSC FILE NOV05 USAGE CLEC TO FROM ICO .xls
 NOVEMBER 2005 ICO TO CLEC

NOVEMBER 2005 US.

Sum of MOU	CLEC 37	CLEC 38	CLEC 39	CLEC 4	CLEC 40	CLEC 41	CLEC 42	CLEC 43	CLEC 44	CLEC 45	CLEC 46	CLEC 48	CLEC 49	CLEC 5	CLEC 50
FROM ICO ALIAS															
ICO 10	50	33,527		12		747					2				
ICO 11		31				30				499					
ICO 12	438	31,182		15,630	808	57,694	58,553		223,183	6,866		13,349	23,237	3,841	
ICO 13	76	3,196		1,939	22	24,707	4,851		21,498	925		1,114	836	518	
ICO 14											186				
ICO 15		261								272	1				
ICO 16	80	978		557	1,986	1,735			32	418		118	1	138	
ICO 17		-				11,594				4,589	7				
ICO 18	641	22,721		678	10,602	761			59	178	6	99	7,137	120	
ICO 19	555	71,593		13,580	47	144,112	24,292		131,692	5,383		28,801	4,399	1,673	
ICO 2		2													
ICO 20		5				10,103				12,284					2,764
ICO 21		1,102			1,587	26				2,508					204
ICO 22						68,944				19,729					3,425
ICO 23		84								32	15,113				2
ICO 24										31	342				
ICO 25	1	9		67	33,508	86,089		238	91	2,398	747	1	178		
ICO 26		702	88,863							1,059					
ICO 27	327	223,558		16,205	116	88,515	591		36,117	15,050		3,963	33,449	1,607	
ICO 28		2				24				162					25
ICO 29		2	174,379							1,250					
ICO 3	425	5,371		3,171	186	1,830	32		10,775	1,410		2,060	2,312	672	
ICO 30	168	182		109	31,075	17,924			25	191	260	35		26	
ICO 31		1,937		22		13	55		25,857	19		50	1,435	-	
ICO 36	5,528	564,805		190,887	529	2,257,024	389,948		1,103,335	306,231	10,052	188,085	521,032	48,304	2,019
ICO 37		528	54,796			12,525				362		1			6,796
ICO 38		-									509				
ICO 4										29					
ICO 5		107								321					46
ICO 6		-								77					4
ICO 7		1,233	48,954							233					
ICO 8		4									9,571				
ICO 9		-				64,702				39,213					3,904
Grand Total	8,289	963,122	366,992	242,857	80,466	2,849,099	478,322	238	1,552,664	421,719	36,797	237,675	594,016	56,899	19,189

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 NOVEMBER 2005 ICO TO CLEC

NOVEMBER 2005 US.

Sum of MOU													Grand Total
FROM ICO ALIAS	CLEC 51	CLEC 52	CLEC 53	CLEC 54	CLEC 55	CLEC 56	CLEC 59	CLEC 6	CLEC 60	CLEC 7	CLEC 8	CLEC 9	
ICO 10		71									4,145		55,809
ICO 11													427,981
ICO 12	644	6,901		42				906			38,678	3,706	1,870,479
ICO 13	252	1,078		11				66			2,679	142	999,171
ICO 14													286,611
ICO 15													30,849
ICO 16	25	302		9				30			2,110	49	17,323
ICO 17			23,026		150								272,065
ICO 18	29	311		3				1			342	40	152,555
ICO 19	367	6,798		20				423			9,099	2,400	2,938,399
ICO 2													170,001
ICO 20													1,402,144
ICO 21			21										785,125
ICO 22													2,400,203
ICO 23													844,131
ICO 24			4		-								2,442,588
ICO 25		6	231,062		26						410	2	3,927,023
ICO 26							58			25,266			3,747,046
ICO 27	82	5,858		73				149			13,508	1,107	1,170,038
ICO 28													4,209
ICO 29										30,453			2,494,014
ICO 3	147	1,055		45				81			2,457	370	68,926
ICO 30	7	47		1							1,796	3	485,606
ICO 31		11		-							38	2	34,366
ICO 36	7,173	86,775	682,712	2,729	14	-		9,195	3		386,094	31,651	47,504,386
ICO 37					34		-			21,997	33		3,572,627
ICO 38													238,963
ICO 4													2,435
ICO 5													6,650
ICO 6													5,223
ICO 7										20,147			2,798,956
ICO 8													391,848
ICO 9													2,023,858
Grand Total	8,726	109,213	936,825	2,933	224	-	58	10,851	3	97,863	461,389	39,472	83,571,608

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 NOVEMBER 2005 USAGE CLEC TO ICO

NOVEMBER 2005 USAGE CLEC TO ICO

Sum of MOU FROM CLEC ALIAS	TO ICO ALIAS															
	ICO 10	ICO 11	ICO 12	ICO 13	ICO 14	ICO 15	ICO 16	ICO 17	ICO 18	ICO 19	ICO 2	ICO 20	ICO 21	ICO 22	ICO 23	ICO 24
CLEC 10																
CLEC 11																2,887
CLEC 12																
CLEC 14	117,716	2,194	6,653	857	8,989	251	10,092	3,464	19	4,527	57	11,208	6,439	14,595	10,764	6,462
CLEC 16																
CLEC 17	27	8	16	20						17		1,239	179	5,104		
CLEC 18																
CLEC 2				1			197			276						
CLEC 20	387		564	1,806	2		20,185		563	8,651					27,146	
CLEC 21	172		37	21			43		3	13						
CLEC 22	2,169							237								200
CLEC 24	14,489		4,738	1,010			1,431		2,220	7,509						
CLEC 25	1,543			452						13,237						
CLEC 27													2			
CLEC 28				706			140			2,109						
CLEC 29	1,525			563			1		176	1,382						
CLEC 3		1				192					1	141	698	56	645	
CLEC 30	60		1	28						115						
CLEC 32																
CLEC 33		8,984		896						1,241	16		227		201	7
CLEC 34																
CLEC 35	55			9						136						
CLEC 36	233			86						547						
CLEC 37	830		172	62			60		818	535						
CLEC 38	21,478	341	4,904	2,570		1,485	4,549		2,459	11,343	110		11,497		2,880	
CLEC 39																
CLEC 4	12,419		92	1,659			112		229	10,125						
CLEC 40													1,512			
CLEC 41	11,189			2,247			200		144	10,308						
CLEC 42	368			90						461						
CLEC 44	2,314		417	154			127		117	1,708						
CLEC 45	157,713		3,616	669			2,019	547	1,679	4,491	575		808		21	230
CLEC 46		19				37		8			167		3		4,517	3,854
CLEC 48			1,472	817			1,017		695	6,009						
CLEC 49	7,120		4,954	81			13			494						
CLEC 5	89,377		119,685	4,360			30,242		151,818	11,968						
CLEC 50												2,938		5,440		
CLEC 51	100			94						458						
CLEC 52	27,636		5,924	1,092			4,262		7,671	6,963						
CLEC 53																
CLEC 54	179									5						
CLEC 55								130					11			111
CLEC 56			17													
CLEC 6	148			18						291						
CLEC 60	4															
CLEC 7																
CLEC 8	4,146		1,045	330			403		1,663	670						
CLEC 9	985		6	139						1,919						
Grand Total	474,382	11,547	154,313	20,837	8,991	1,965	75,093	4,386	170,274	107,508	926	15,526	21,376	25,195	49,061	10,864

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Sum of MOU	FROM CLEC ALIAS	ICO 25	ICO 26	ICO 27	ICO 28	ICO 29	ICO 3	ICO 30	ICO 31	ICO 32	ICO 36	ICO 37	ICO 38	ICO 4	ICO 5	ICO 6	ICO 7
CLEC 10											178,355						
CLEC 11											14	1,301					
CLEC 12			826			191					149						220
CLEC 14		20,697		75,804	16,922		3,375	5,221	3,775	5,450	565,245	90,363	682	43	7,564	4,000	
CLEC 16			9,026			4,839						3,362					5,012
CLEC 17				24	5,738						812	15,507			2,139	3	
CLEC 18			74,524			35,238						25,092					25,705
CLEC 2											6,184						
CLEC 20				560			17,828	2,761	58		4,523	49	3,270				
CLEC 21				436			25		4		3,699	92					
CLEC 22		271									1,199	247					
CLEC 24		1,355		9,596			806	116	2,030		149,923	5,879					
CLEC 25				175							32,195						
CLEC 27																	
CLEC 28							197	8									
CLEC 29		2,112		233			4	3,077	1		21,988	191					
CLEC 3					802						1,736	2,053		52	181	28	
CLEC 30				13							3,334	6					
CLEC 32			14,018			8,719						5,075					5,502
CLEC 33		27					3,337	2,319			50	2	1	913			
CLEC 34			2,577			217											5,317
CLEC 35				22							2,294	1					
CLEC 36				94							3,819						
CLEC 37		180		1,150			52	1	7		11,596	974					
CLEC 38		1,792		37,431			4,252	2,034	970		234,100	52,538		771			
CLEC 39			41,188			20,950						16,403					19,520
CLEC 4				2,555							158,123	534					
CLEC 40		36,563						31,015									
CLEC 41		99		2,115			417	88			139,325	2,039					
CLEC 42				83							5,455						
CLEC 44		9		2,254			151	7	138		24,969	740					
CLEC 45		3,433		28,626			1,979	71	1,039	8,239	200,272	16,757		410		3,329	
CLEC 46		1,126			2			598				4	989		3	25	
CLEC 48		71		10,183			2,388	66	771		1,754	1,228					
CLEC 49		249		12,906			2,169		7		25,685	2,788					
CLEC 5		7,066		325,721			64,169	7,040	90,745		504,587	73,680					
CLEC 50												9,568					
CLEC 51				8							7,936						
CLEC 52		2,759		28,849			2,277	1,027	12,831		260,024	16,512					
CLEC 53		1,403									4	1,628					
CLEC 54											2,458						
CLEC 55		441								506	1,628	236					
CLEC 56											1						
CLEC 6				21							11,763						
CLEC 60											16						
CLEC 7			5,217			1,464						1,519					1,937
CLEC 8				4,491			1,095		99		14,838	1,075					
CLEC 9				529							30,397						
Grand Total		79,653	147,376	543,879	23,464	71,618	104,521	55,449	112,475	14,544	2,610,301	347,592	4,942	2,189	9,887	7,385	63,213

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 NOVEMBER 2005 USAGE CLEC TO ICO

NOVEMBER 2005 USAG

Sum of MOU			
FROM CLEC ALIAS	ICO 8	ICO 9	Grand Total
CLEC 10			178,355
CLEC 11			4,202
CLEC 12			1,386
CLEC 14	3,009	48,294	1,054,731
CLEC 16			22,239
CLEC 17		20,609	51,442
CLEC 18			160,559
CLEC 2			6,658
CLEC 20	30,720		119,073
CLEC 21			4,545
CLEC 22			4,671
CLEC 24			201,102
CLEC 25			47,602
CLEC 27			2
CLEC 28			3,160
CLEC 29			31,253
CLEC 3		105	6,691
CLEC 30			3,557
CLEC 32			33,314
CLEC 33	77		18,299
CLEC 34			8,111
CLEC 35			2,517
CLEC 36			4,779
CLEC 37			16,437
CLEC 38	23		397,527
CLEC 39			98,061
CLEC 4			185,848
CLEC 40			69,090
CLEC 41			168,171
CLEC 42			6,457
CLEC 44			33,105
CLEC 45			436,523
CLEC 46	20,635	27	32,014
CLEC 48			26,471
CLEC 49			56,466
CLEC 5			1,480,458
CLEC 50		6,470	24,416
CLEC 51			8,596
CLEC 52			377,827
CLEC 53			3,035
CLEC 54			2,642
CLEC 55			3,063
CLEC 56			18
CLEC 6			12,241
CLEC 60			20
CLEC 7			10,137
CLEC 8			29,855
CLEC 9			33,975
Grand Total	54,464	75,505	5,480,701

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Compel Responses to Interrogatories was served via electronic mail and first class United States mail this 1st day of March, 2006, to the following:

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