

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
Charles V. Gerkin, Jr.
FRIEND, HUDAK & HARRIS, LLP
Suite 1450
Three Ravinia Drive
Atlanta, GA 30346
Telephone: 770-399-9500
Fax: 770-234-5965
cgerkin@fh2.com

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

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

BellSouth Telecommunications, Inc.
Legal Department
1025 Lenox Park Boulevard
Suite 6C01
Atlanta, GA 30319-5309

lisa.foshee@bellsouth.com

Lisa S. Foshee
General Counsel - Georgia

404 986 1718
Fax 404 986 1800

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,



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 TO CLEC ALIAS		CLEC 10	CLEC 11	CLEC 12	CLEC 13	CLEC 14	CLEC 15	CLEC 16	CLEC 17	CLEC 18	CLEC 19	CLEC 20	CLEC 21	CLEC 22
Sum of MOU FROM ICO ALIAS														
ICO 10						10,478			28			63	10	
ICO 11		229				281			265			166,677	8,265	
ICO 12	3,058					20,239			111			54,109	486	
ICO 13	1,343					18,422			35			192,687		
ICO 14						11,298								
ICO 15		69				760			29			190	18	
ICO 16	432					6,311								
ICO 17						9,413			1			38,714	39	
ICO 18	42					40,485			124			350,316	2,188	
ICO 19	70													
ICO 20			8			18,312			4,494					
ICO 21			4			19,704			101,275					
ICO 22		295				54,544	3		19,954					
ICO 23		47				20,430			2			211,784		
ICO 24			9			7,541						106,915		177
ICO 25						108,504								
ICO 26				1,359		131,661		118,774	19	87,538	2,948,146			
ICO 27	487		14			33			85			70,489	119	
ICO 28				486				27,052		38,269	865,024			
ICO 29									7					
ICO 30	1,249				8	919						1,459	177	
ICO 31	52				2	42,942						146,726	23	
ICO 32	1					191			3				54	
ICO 33						2,095,207			17,118			6,123,324	101,829	399
ICO 34	95			420		54,607		70,955	25,288	37,674	2,771,030	25,875		
ICO 35						5,171						160,016		
ICO 36		532,972												
ICO 37		923												
ICO 38														
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ICO 95														
ICO 96														
ICO 97														
ICO 98														
ICO 99														
ICO 100														
Grand Total		6,829	535,138	2,777	10	2,711,267	3	271,708	208,039	197,753	8,924,437	13,100	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		30	47					201					
ICO 11	182,754					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 20	215					163,351		6,425								
ICO 21	1,255,842				462	96,701		73			1,100					
ICO 22	63,745				53	138		594,221			243					
ICO 23	2,089,441				239	142,076		131			1,673					
ICO 24	329,903					133,233		133,246			293					
ICO 25	200,605							2,233,675			390					
ICO 26	3,156,890					182,687	3,145	7,199	38		6,627					
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										199,362		822				
ICO 30	13,923	2,444	5,697			6,264	3,026		93		919		153	92		
ICO 31	71,972	124	12			166,663	4,063		6		1,151			1		
ICO 32	123	49	5			11	4,436		19		35					
ICO 33	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 34	4,572		16,050					3,688			55					
ICO 35	72,306					952					9					
ICO 36	867					1,016					3					
ICO 37	5,923					23		1			49					
ICO 38	4,262					792		12			9					
ICO 39																
ICO 40	29,931					521		57,471			100					
ICO 41	1,677,543					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		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	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				
ICO 24										31	342				
ICO 25	1	9		67	33,508	86,089	238		91	2,398	747	1	178		
ICO 26		702								1,059					
ICO 27	327	223,558		16,205	116	88,515	591		36,117	15,050	3,963	33,449	1,607		25
ICO 28		2				24				162					
ICO 29		2								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	35	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				12,525				362	1				6,796
ICO 38											509				
ICO 4										29					46
ICO 5		107								321					
ICO 6										77					4
ICO 7		1,233								233					
ICO 8		4													
ICO 9											9,571				
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

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 51	CLEC 52	CLEC 53	CLEC 54	CLEC 55	CLEC 56	CLEC 59	CLEC 6	CLEC 60	CLEC 7	CLEC 8	CLEC 9	Grand Total
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 20													170,001
ICO 21			21										1,402,144
ICO 22													785,125
ICO 23													2,400,203
ICO 24													844,131
ICO 25					26						410	2	2,442,588
ICO 26							58			25,266			3,927,023
ICO 27	82	5,858		73				149			13,508	1,107	3,747,046
ICO 28													1,170,038
ICO 29													4,209
ICO 3	147	1,055		45				81		30,453	2,457	370	2,494,014
ICO 30	7	47		1							1,796	3	68,926
ICO 31		11									38	2	485,606
ICO 36	7,173	86,775	682,712	2,729	14			9,195	3		386,094	31,651	34,366
ICO 37					34					21,997			47,504,386
ICO 38											33		3,572,627
ICO 4													238,963
ICO 5													2,435
ICO 6													6,650
ICO 7													5,223
ICO 8									20,147				2,798,956
ICO 9													391,848
Grand Total	8,726	109,213	936,825	2,933	224	-	58	10,851	3	97,863	461,389	39,472	83,571,608

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

NOVEMBER 2005 USAGE CLEC TO ICO		TO ICO ALIAS														
Sum of MOU	ICO 10	ICO 11	ICO 12	ICO 13	ICO 14	ICO 15	ICO 16	ICO 17	ICO 18	ICO 19	ICO 20	ICO 21	ICO 22	ICO 23	ICO 24	
CLEC 10																
CLEC 11																
CLEC 12																
CLEC 14																
CLEC 16																
CLEC 17	27	8	16	20												
CLEC 18																
CLEC 20	387		564	1,806	1		197									
CLEC 21	172		37	21	2		20,185		563	8,651					27,146	
CLEC 22	2,169						43		3	13						
CLEC 24	14,489		4,738	1,010			1,431	237	2,220	7,509					200	
CLEC 25	1,543			452						13,237						
CLEC 27																
CLEC 28				706			140			2,109						
CLEC 29	1,525			563			1		176	1,382						
CLEC 30	60	1		28		192				115						
CLEC 32																
CLEC 33																
CLEC 34		8,984		896						1,241	16	227		201	7	
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 40	12,419		92	1,659			112		229	10,125						
CLEC 41	11,189			2,247			200		144	10,308		1,512				
CLEC 42	368			90						461						
CLEC 44	2,314		417	154			127		117	1,708						
CLEC 45	157,713		3,616	669		37	2,019	547	1,679	4,491	575	808		21	230	
CLEC 46		19						8			167	3		4,517	3,854	
CLEC 48				817			1,017		695	6,009						
CLEC 49	7,120		1,472	81			13			494						
CLEC 5	89,377		4,954	4,360			30,242		151,818	11,968						
CLEC 50			119,685													
CLEC 51	100		5,924	94			4,262		7,671	458			5,440			
CLEC 52	27,636			1,092						6,963						
CLEC 53																
CLEC 54	179															
CLEC 55																
CLEC 56																
CLEC 6	148		17	18			130			5		11			111	
CLEC 7	4															
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

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

NOVEMBER 2005 USAG																
Sum of MOU	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
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					191					14	1,301					
CLEC 12			826								149					220
CLEC 14	20,697		75,804	16,922			3,375	5,221	3,775	5,450	90,363	682	43	7,564	4,000	
CLEC 16			9,026		4,839						3,362					5,012
CLEC 17				5,738							15,507					
CLEC 18			74,524		35,238						25,092			2,139	3	25,705
CLEC 2																
CLEC 20			560				17,828	2,761	58		49	3,270				
CLEC 21			436				25	4			92					
CLEC 22									348		247					
CLEC 24	271															
CLEC 25	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		191					
CLEC 3											2,053		52	181	28	
CLEC 30											6					
CLEC 32				802												
CLEC 33					8,719						5,075					
CLEC 34					217						2	1	913			
CLEC 35																
CLEC 36																
CLEC 37	180						52	1	7		974					
CLEC 38	1,792		14,018				4,252	2,034	970	234,100	52,538		771			5,502
CLEC 39											16,403					
CLEC 4																
CLEC 40	36,563		2,555							158,123	534					
CLEC 41	99															
CLEC 42																
CLEC 44	9															
CLEC 45	3,433															
CLEC 46	1,126															
CLEC 48	71															
CLEC 49	249															
CLEC 5	7,066		41,188													
CLEC 50																
CLEC 51																
CLEC 52	2,759															
CLEC 53	1,403															
CLEC 54																
CLEC 55	441															
CLEC 56																
CLEC 60																
CLEC 7																
CLEC 8																
CLEC 9																
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

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			6,470	1,480,458
CLEC 50				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

PARTIES OF RECORD

Docket No. 16772-U

Ms. Jeanette Mellinger
Consumers' Utility Counsel Division
2 Martin Luther King, Jr. Drive
Suite 356, East Tower
Atlanta, GA 30334
(404) 656-7710 o; (404) 651-9394 f
jeanette.mellinger@cuc.oca.state.ga.us

Daniel S. Walsh, Esquire
Attorney General's Office
Department of Law – State of Georgia
40 Capitol Avenue, S.W.
Atlanta, GA 30334-1300
(404) 657-2204 o; (404) 656-0677 f
dan.walsh@law.state.ga.us

Stephen G. Kraskin, Esquire
Kraskin, Lessee & Cosson LLC
2129 L Street, N.W.
Suite 520
Washington, DC 20037
(202) 296-9055 o; (202) 296-8893
[Counsel for GTA]
skraskin@klctele.com
jsilk@gta.org

Suzanne W. Ockleberry, Esquire
AT&T Communications
of the Southern States, Inc.
1230 Peachtree Street, 4th Floor
Atlanta, GA 30309
(404) 810-7175 o; (404) 877-7645 f
[Counsel for AT&T Communications]
sockleberry@att.com

Dulaney L. O'Roark III, Esquire
MCI, Inc.
Six Concourse Parkway
Suite 600
Atlanta, GA 30328
(770) 284-5498 o; (770) 284-5488 f
[Counsel for MCI]
de.oroark@mci.com

David I. Adelman, Esquire
Charles B. Jones III, Esquire
Sutherland Asbill & Brennan LLP
999 Peachtree Street, N.E.
Atlanta, GA 30309
(404) 853-8206 o; (404) 853-8806 f
[Counsel for MCI]
[Counsel for Cbeyond]
david.adelman@sablaw.com
clay.jones@sablaw.com

William R. Atkinson, Esquire
Sprint Communications Company L.P.
3065 Cumberland Circle
Mailstop GAATLD0602
Atlanta, GA 30339
[Counsel for Sprint]
(404) 649-4882 o; (404) 649-1652 f
bill.atkinson@mail.sprint.com

William W. Maycock, Esquire
Smith, Gambrell & Russell
Suite 3100, Promenade II
1230 Peachtree Street
Atlanta, GA 30309
(404) 815-3500 o; (404) 815-3509 f
[Counsel for Sprint]
bmaycock@sgrlaw.com

Charles F. Palmer, Esquire
David K. Wilson, Esquire
Troutman Sanders LLP
600 Peachtree Street, N.E.
5200 Bank of America Plaza
Atlanta, GA 30308-2215
(404) 885-3000 o; (404) 885-3900 f
[Counsel for Celco Partnership d/b/a
Verizon Wireless, ICG Telecom,
and SouthernLINC]
charles.palmer@troutmansanders.com
david.wilson@troutmansanders.com

Terri M. Lyndall, Esquire
Galloway & Lyndall, LLP
3525 Piedmont Road, N.E.
Six Piedmont Center, Suite 303
Atlanta, GA 30305
(404) 256-2422 o; (404) 256-1402 f
[Counsel for Public Service Cellular,
US LEC of Georgia, Inc., SECCA
KMC Telecom III, LLC and KMC
Telecom V, Inc., Florida Digital Network]
tlyndall@gallyn-law.com

Charles A. Hudak, Esquire
Ronald V. Jackson, Esquire
Friend, Hudak & Harris, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-1231
(770) 399-9500 o; (770) 395-0000 f
[Counsel for Time Warner Telecom
of Georgia, L.P.]
chudak@fh2.com
rjackson@fh2.com

Dan Menser, Esquire
Shannon Reilly, Esquire
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006
(425) 378-4000 o; (425) 920-2638 f
[Counsel for T-Mobile USA, Inc.]
dan.menser@t-mobile.com
shannon.reilly@t-mobile.com

Newton M. Galloway, Esquire
Galloway & Lyndall, LLP
The Lewis Mill House
406 North Hill Street
Griffin, GA 30223
(770) 233-6230 o; (770) 233-6231 f
[Counsel for Public Service Cellular,
US LEC of Georgia, Inc., SECCA,
KMC Telecom III, LLC and KMC
Telecom V, Inc., Florida Digital Network]
ngalloway@gallyn-law.com

Matthew Feil, Esquire
General Counsel
Florida Digital Networks, Inc.
390 North Orange Avenue, Suite 2000
Orlando, FL 32801
(407) 835-0460 o; (407) 835-0309 f
[Counsel for Florida Digital Network]
mfeil@floridadigital.net

Charles B. Welch Jr., Esquire
Farris, Mathews, Branam, Bobango
& Hellen, PLC
618 Church Street, Suite 300
Nashville, TN 37219
(615) 726-1200 o; (615) 726-1776 f
[Counsel for Time Warner Telecom
of Georgia, L.P.]
cwelch@farrismathews.com

Suzanne Toller, Esquire
Davis Wright Tremaine LLP
1500 K Street, N.W., Suite 450
Washington, DC 20005
(202) 508-6600 o; (202) 508-6600 g
[Counsel for AT&T Wireless Services, Inc.]
suzannetoller@dwt.com

Nanette S. Edwards, Esquire
ITC^DeltaCom Communications, Inc.
7037 Old Mansion Pike, Suite 400
Huntsville, AL 35806
(256) 382-3856 o; (256) 382-3036 f
[Counsel for ITC^DeltaCom]
nedwards@itcdeltacom.com

Frank B. Strickland, Esquire
Anne W. Lewis, Esquire
Strickland Brockington & Lewis LLP
Midtown Proscenium, Suite 2000
1170 Peachtree Street, N.E.
Atlanta, GA 30309
(678) 347-2204 o; (678) 347-2210 f
[Counsel for Xspedius Communications]
fbs@sblaw.net
awl@sblaw.net

Ms. Julia Strow
Cbeyond Communications, Inc.
320 Interstate North Parkway, S.E.
Suite 300
Atlanta, GA 30339
(678) 424-2429 o
julia.strow@cbeyond.net

Mr. Philip L. Forbes
USCarrier Telecom
Suite 200
180 Interstate North Parkway
Atlanta, GA 30339
(678) 454-1415 o; (678) 454-1429 f
pforbes@uscarrier.com

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:

Felicia Banks
Michael Barrett
Linda King
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0850
fbanks@psc.state.fl.us
mbarrett@psc.state.fl.us
lking@psc.state.fl.us

Tracy Hatch
AT&T Communications of the Southern
States, LLC
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549
Phone: (850) 425-6364
FAX: 425-6361
thatch@att.com

J. Jeffrey Wahlen
Ausley & McMullen, P.A.
P.O. Box 391
Tallahassee, FL 32302
Phone: 850-425-5471
FAX: 222-7560
jwahlen@ausley.com

Nancy B. White/R. D. Lackey
BellSouth Telecommunications, Inc.
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556
Phone: 850-577-5555
FAX: 222-8640
Nancy.sims@bellsouth.com
Nancy.white@bellsouth.com

Ken Hoffman/Martin McDonnell/M. Rule
Rutledge Ecenia et al.
P.O. Box 551
Tallahassee, FL 32302-0551
Phone: 850-681-6788
FAX: 681-6515
ken@reuphlaw.com
marty@reuphlaw.com

William R. Atkinson
Sprint Nextel (GA)
Mailstop GAATLD0602
3065 Cumberland Circle SE
Atlanta, GA 30339
Phone: 404-649-4882
FAX: 404-649-1652
bill.atkinson@sprint.com

Charles V. Gerkin, Jr.
Friend, Hudak & Harris, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346
Phone: 770-399-9500
FAX: 770-234-5965
cgerkin@fh2.com

Floyd Self
Messer, Caparello & Self
215 S. Monroe Street, Suite 1701
Tallahassee, FL 32301
Phone: 850-222-0720
FAX: 850-224-4359
fself@lawfla.com

Charles F. Palmer
Verizon Wireless
Troutman Sanders LLP
600 Peachtree Street, N.E., Suite 5200
Atlanta, GA 30308-2216

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

s/Vicki Gordon Kaufman
Vicki Gordon Kaufman