

Robert A. Culpepper

Senior Regulatory Counsel
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0841

March 8, 2006

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

Re: Docket No. 050119-TL and 050125-TP

Dear Ms. Bayó:

In connection with the above-referenced consolidated dockets, please find enclosed is BellSouth's Response to MetroPCS's Motion to Compel Interrogatory Responses, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



Robert A. Culpepper

cc: All Parties of Record
Jerry Hendrix
R. Douglas Lackey
Nancy B. White

CERTIFICATE OF SERVICE
Docket Nos.: 050119-TL and 050125-TP;
Consolidated Pursuant to Order No.: PSC-05-0517-PAA-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and U.S. Mail this 8th day of March, 2006 to the following:

Felicia Banks
Laura King
Michael Barrett
Staff Counsels
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

Stephen B. Rowell, Esq.
ALLTEL
One Allied Drive, B5F11
Little Rock, AR 72202
Tel. No. (501) 905-8460
Fax. No. (501) 905-4443
stephen.b.rowell@alltel.com

Benjamin H. Dickens, Esq.
Blooston, Mordokofsky, Jackson
& Dickens
2120 L Street, N.W. Suite 300
Washington, DC 20037
Tel. No. (202) 828-5510
Fax. No. (202) 828-5568
bhd@bloostonlaw.com

Kenneth A. Hoffman, Esq.
Martin P. McDonnell, Esq.
Marsha E. Rule, Esq.
Rutledge, Ecenia, Purnell & Hoffman
215 South Monroe Street, Suite 420
Tallahassee, FL 32301
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515
ken@reuphlaw.com
marty@reuphlaw.com
marsha@reuphlaw.com

Tracy Hatch Esq.
AT&T Communications of the Southern
States, LLC
101 North Monroe Street, #700
Tallahassee, FL 32301-1546
Tel. No.: (850) 425-6309
Fax No.: (832) 213-0204
thatch@att.com

ALLTEL Florida, Inc.
Mr. James White
6867 Southpoint Drive, N., Suite 103
Jacksonville, FL 32216-8005
Tel. No.: (904) 470-4769
Fax No.: (904) 296-6892
james.white@alltel.com

J. Jeffry Wahlen
Ausley & McMullen
Post Office Box 391
Tallahassee, FL 32302
Tel. No. (850) 425-5471
jwahlen@ausley.com
Atty. for ALLTEL Florida, Inc.

Frontier Communications
of the South, Inc.
Ms. Angie McCall
Senior Regulatory Analyst
300 Bland Street
P. O. Box 770
Bluefield, WV 24701
Tel. No. (304) 325-1688
Fax. No. (304) 325-1483
amccall@czn.com

GT Com
Mr. R. Mark Ellmer
P. O. Box 220
Port St. Joe, FL 32457-0220
Tel. No.: (850) 229-7315
Fax No.: (850) 229-5141
mellmer@fairpoint.com

ITS Telecommunications Systems, Inc.
Mr. Robert M. Post, Jr.
16001 SW Market Street
Indiantown, FL 34956-0277
Tel. No.: (772) 597-3113
Fax No.: (772) 597-2110
maryannh@itstelecom.net

NEFCOM
Ms. Deborah Nobles
505 Plaza Circle, Suite 200
Orange Park, FL 32073-9409
Tel. No.: (904) 688-0029
Fax No.: (904) 688-0025
dnobles@townes.net

Lynn B. Hall
Smart City Telecom
3100 Bonnett Creek Road
Lake Buena Vista, FL
Tel. No.: (407) 828-6730
FAX: (407) 828-6734
lbhall@smartcity.com

TDS Telecom/Quincy Telephone
Mr. Thomas M. McCabe
P. O. Box 189
Quincy, FL 32353-0189
Phone: (850) 875-5207
FAX: 875-5225
Thomas.mccabe@tdstelecom.com

Charles V. Gerkin, Jr. (+)
FRIEND, HUDAK & HARRIS, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346
Tel. No. (304) 325-1688
Fax. No. (304) 325-1483
cgerkin@fh2.com
Represents MetroPCS

Vicki Gordon Kaufman
Moyle Flanigan Katz Raymond
& Sheehan, PA
118 North Gadsden Street
Tallahassee, Florida 32301
Tel. No. (850) 681-3828
Fax. No. (850) 681-8788
vkaufman@moylelaw.com
Atty. for NuVox
Atty. for CompSouth
Atty. for MetroPCS
Atty. Sprint Nextel

Susan J. Berlin
NuVox Communications, Inc.
Two North Main Street
Greenville, S.C. 29601
Tel. No. (864) 331-7323
Fax. No. (864) 672-5105
sberlin@nuvox.com

Ronald W. Gavillet
Neutral Tandem-Florida, LLC
One South Wacker, Suite 200
Chicago, IL 60606
Tel. No. (312) 384-8000
Fax. No. (312) 346-3276

William R. Atkinson
Sprint Nextel
3065 Cumberland Circle, SE
Mailstop GA ATLD0602
Atlanta, GA 30339


Michele K. Thomas, Esq.
Sr. Corporate Counsel
T-Mobile
60 Wells Avenue
Newton, MA 02459
Tel. No. (617) 630-3126
Fax. No. (617) 630-3187
Michele.Thomas@T-Mobile.com

Floyd Self, Esq.
Messer, Caparello & Self
Hand: 215 S. Monroe Street, Ste. 701
Tallahassee, FL 32301
Mail: P.O. Box 1876
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
fself@lawfla.com

Charles F. Palmer
Troutman Sanders LLP
600 Peachtree Street, N.E.
Suite 5200
Atlanta, GA 30308-2216
Tel. No. (404) 885-3402
Fax. No. (404) 962-6647
charles.palmer@troutmansanders.com

Elaine Critides
Verizon Wireless
Legal & External Affairs Department
1300 I Street, N.W. – Suite 400 West
Washington, D.C. 20005
Tel. No. (202) 589-3756
Fax. No. (202) 589-3750
elaine.critides@verizonwireless.com

Michael A. Gross
VP – Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assn.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com



Robert A. Culpepper

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of TDS Telecom d/b/a TDS) Docket No. 050119-TL
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)
)
)
In re: Petition and Complaint of AT&T) Docket No. 050125-TP
Communication of the Southern States, LLC)
For suspension and cancellation of Transit Traffic)
Service Tariff No. FL2004-284 filed by)
BellSouth Telecommunications, Inc.)
)
) Filed: March 8, 2006

**BELLSOUTH’S RESPONSE TO MetroPCS’s
MOTION TO COMPEL INTERROGATORY RESPONSES**

BellSouth Telecommunications, Inc. (“BellSouth”) hereby files this Response in Opposition to the Motion to Compel Responses to Interrogatories by BellSouth Telecommunications, Inc. (“Motion to Compel”) filed by MetroPCS California/Florida, Inc. (“MetroPCS”) on March 1, 2006. In responding to the Motion to Compel, BellSouth incorporates by reference its General and Specific Objections to MetroPCS’s First Set of Interrogatories and First Requests for Production of Documents.¹ Further, BellSouth objects to MetroPCS’s assertion that it “reserves the right to move to compel responses to Interrogatory Nos. 1 and 2 after the Florida Public Service Commission (“Commission”)” issues a ruling in this consolidated docket. Motion to Compel at ¶ 6. Such a

¹ Among other things, BellSouth’s general objections to MetroPCS’s first set of interrogatories included an objection based on relevancy (“BellSouth objects to each and every discovery request insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action”). Accordingly, MetroPCS’s assertion that “BellSouth has not objected to the relevance of the information sought in Interrogatory Nos. 3 and 5” is incorrect. Motion to Compel at ¶ 9.

reservation is inappropriate and not permitted by the *Order Establishing Procedure* issued in this consolidated docket which, absent specific authorization, requires the completion of all discovery by March 20, 2006.²

With respect to the MetroPCS's Motion to Compel responses to Interrogatories Nos. 3 and 5, BellSouth will provide the information sought in MetroPCS's alternative requested relief: Specifically, as requested by MetroPCS, BellSouth will provide: "*the aggregate number of transit 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.*" Motion to Compel, p. 8. BellSouth is compiling the requested information and should be able to provide such information by March 14, 2006.

Accordingly, because BellSouth has agreed to provide the "alternative" information requested by MetroPCS, the Commission should consider the matter resolved. In the alternative, the Commission should deny the Motion to Compel to the extent that MetroPCS seeks to compel BellSouth to fully respond to Interrogatories Nos. 3 and 5. Among other things, such Interrogatories: (i) seek the discovery of proprietary information;³ (ii) are overly broad and unduly burdensome; and (iii) remain irrelevant.

² Order No. PSC-05-1206-PCO-TP; issued December 6, 2005 at p. 2.

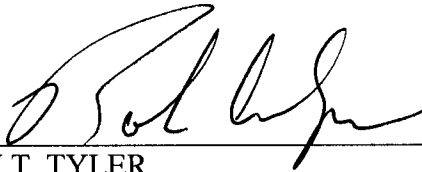
³ MetroPCS incorrectly asserts that BellSouth's CPNI-related objections to Interrogatories Nos. 3 and 5 is somehow inconsistent with BellSouth's response to Item No. 1 of the Small LECs' First Set of Interrogatories. CPNI includes information relating to the "amount of use of a telecommunications service...." 47 U.S.C. § 222(f). MetroPCS is requesting information relating to the minutes of use of transit traffic delivered by CLECs to BellSouth. In contrast, BellSouth's response to Item No. 1 to the Small LECs First Set of Interrogatories simply identifies third-party carriers that exchange traffic with Florida ICOs. Completely consistent with BellSouth's response to MetroPCS, BellSouth's response to the Small LECs mentions proprietary concerns and directs interested parties to a pass word protected web site to view company specific information such as minutes of use information.

Respectfully submitted this 8th day of March, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy White By TAE

NANCY B. WHITE
MANUEL A. GURDIAN
c/o Nancy H. Sims
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5558



JOHN T. TYLER
ROBERT A. CULPEPPER
Suite 4300, BellSouth Center
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0757

COUNSEL FOR BELLSOUTH
TELECOMMUNICATIONS, INC.

624294