

STATE OF FLORIDA
PUBLIC SERVICE COMMISSION

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Petition To Set Aside 2/3/98 Order)
Approving Resale, Interconnection And)
Unbundling Agreement Between BellSouth)
Telecommunications And Supra)
Telecommunications & Information Systems;)
And To Approve Agreement Actually Entered)
Into By The Parties Pursuant to Sections)
251, 252 and 271 Of The)
Telecommunications Act Of 1996)
_____)

RECORDS AND
REPORTING

Docket No.: 98-1832-TP

SUPRA'S FIRST REQUEST FOR ADMISSIONS TO BELLSOUTH

Petitioner SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC.,
pursuant to Rule 25-22.034, F.A.C. and 1.370, Fla. R. Civ. P., hereby requests that BELLSOUTH
TELECOMMUNICATIONS admit the truth of the following matters:

INSTRUCTIONS AND DEFINITIONS

1. "Supra" means Supra Telecommunications & Information Systems, Inc.
2. "BellSouth" means BellSouth Telecommunications, Inc.

REQUESTS

ACK _____
AFA _____
APP _____
CAF _____
CMU 1 _____
CTR _____
EAG _____
LEG 1 _____
LIN _____
OPC _____
RCH _____
SEC 1 _____
WAS _____
OTH _____

1. Admit that Supra is a Florida-based minority-owned corporation certificated by the
Florida Public Service Commission as an Alternative Local Exchange Carrier as defined by Section
251(h) of the Telecommunications Act of 1996.
2. Admit that on October 17, 1997, Supra contacted BellSouth requesting negotiation
of an interconnection agreement with BellSouth pursuant to Sections 251 and 251 of the
Telecommunications Act of 1996.

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

3. Admit that BellSouth responded to Supra's October 17, 1997 request for negotiation of an interconnection agreement by providing Supra via Federal Express a proposed interconnection agreement that did not specifically mention Supra by name, but rather only made reference to "ALEC-1" as the relevant party entering into the agreement (hereinafter, "the ALEC-1 Agreement").

4. Admit that on or about October 20, 1997, Olukayode Ramos, as President and CEO of Supra, executed and returned the ALEC-1 Agreement to BellSouth via Federal Express.

5. Admit that but for the docket stamp in the upper right-hand corner and extraneous handwritten underlines and circles, the document labeled Attachment "A" hereto is a true and correct copy of the ALEC-1 Agreement signed by Mr. Ramos.

6. Admit that on or about October 21, 1997, Patrick Finlen advised Mr. Ramos that BellSouth would revise the ALEC-1 Agreement to replace the words "ALEC-1" with "Supra Telecommunications & Information Systems, Inc."

7. Admit that Mr. Finlen informed Mr. Ramos that no other changes would be made to the ALEC-1 Agreement.

8. Admit that on October 21, 1997, Mr. Finlen sent Mr. Ramos (via e-mail) a copy of a revised proposed interconnection agreement.

9. Admit that the document labeled Attachment "B" hereto is a true and correct copy of the e-mail (with attached files) sent by Mr. Finlen to Mr. Ramos on October 21, 1997.

10. Admit that on October 23, 1997, Mr. Finlen Federal Expressed to Mr. Ramos a hard copy of the document labeled Attachment "B" hereto.

11. Admit that on October 27, 1997, Mr. Ramos executed the agreement Federal Expressed to him on October 23, 1997.

12. Admit that after signing the Agreement Mr. Ramos immediately Federal Expressed to BellSouth the Agreement that had been Federal Expressed by BellSouth on October 23, 1997.

13. Admit that on November 24, 1997, BellSouth filed with the Public Service Commission a petition which represented the agreement attached to it was a correct copy of the interconnection agreement executed by Mr. Ramos and Mr. Finlen.

14. Admit that but for various extraneous handwritten underline and circle marks, the document attached as Attachment "C" hereto is a true and correct copy of the agreement BellSouth filed with the Public Service Commission on November 24, 1997.

15. Admit that Patrick Finlen of BellSouth used the wrong attachments in preparing the document attached as Attachment "C".

16. Admit that Attachments 2, 11, and 9 to the interconnection agreement filed by BellSouth with the Public Service Commission on November 24, 1997, were different from attachments 2, 11, and 9 to the documents attached hereto as Attachments "A" and "B".

17. Admit that the document labeled Attachment "D" is a true and correct copy of an order of the Public Service Commission entitled "Order Approving Resale, Interconnection, And Unbundling Agreement," and entered on February 3, 1998.

18. Admit that BellSouth did not inform the Public Service Commission that it included the wrong attachments with the interconnection agreement filed with the Public Service Commission on November 24, 1997.

19. Admit that in April 1998 Supra requested pricing from Mr. Finlen in reference to various unbundled network elements ("UNEs") and combinations of UNEs.

20. Admit that the document labeled Attachment "E" is a true and correct copy of a letter

dated June 22, 1998, from Supra to Marcus Cathey of BellSouth.

21. Admit that the document labeled Attachment "F" is a true and correct copy of a letter from Marcus Cathey to Supra, dated July 2, 1998.

22. Admit that BellSouth informed Supra that even if the altered attachments 2, 11 & 9 to the interconnection agreement filed with the Public Service Commission on November 24, 1997, were amended to match attachments 2, 11 & 9 of the interconnection agreement attached as Attachment "B" hereto, that BellSouth would not provide recombined UNEs to Supra without a so-called "glue charge."

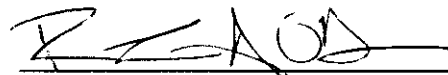
23. Admit that BellSouth has not yet identified to Supra the "glue charge" referenced in Request No. 19, above.

24. Admit that Supra never agreed to the version of the interconnection agreement (including attachments) that was filed with the Public Service Commission on November 24, 1997.

25. Admit that in Public Service Commission Docket No. 980155, BellSouth moved to dismiss Supra's petition based on its contention that a filed and approved interconnection agreement already existed between BellSouth and Supra.

**GUNSTER, YOAKLEY, VALDES-FAULI
& STEWART, P.A.**

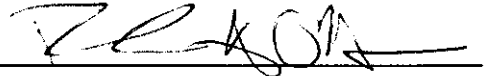
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed with the Florida Public Service Commission, Records and Reporting, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0851 and a copy has been furnished by U.S. mail to Nancy B. White and J. Phillip Carver, General Counsel-Florida, BellSouth Telecommunications, Inc., 150 S. Monroe Street, Room 400, Tallahassee, FL 32301 and Kathy Bedell, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0851 on this 25th day of March 1999.



Rebecca A. O'Hara