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June 28, 2000

VIA FEDERAL EXPRESS

Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Re: Florida Digital Network, Inc.'s Response to BellSouth's First Set of Interrogatories and First Request for Production of Documents in Docket No. 990649-TP

MAIL ROOM
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Dear Ms. Bayo:

Enclosed please find one original and fifteen copies of Florida Digital Network, Inc.'s Response to BellSouth's First Set of Interrogatories and First Request for Production of Documents in Docket No. 990649-TP. Please date stamp and return the extra copy to us in the enclosed self addressed, postage paid envelope.

Please feel free to contact me if you have any questions or require further information.

Sincerely,

Marc B. Rothschild
Counsel for Florida Digital Network, Inc.

Enclosures

- APP
- LEAF
- CMP *Albala*
- COM *5*
- CTR
- ECR
- LEG *2*
- OPC
- PAI
- RGO
- SEC *1*
- SER
- OTH

Mike Gallagher

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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Investigation into Pricing of)
Unbundled Network Elements)
_____)

Docket No. 990649-TP

Filed: June 28, 2000

**FLORIDA DIGITAL NETWORK'S
RESPONSES AND OBJECTIONS TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Florida Digital Network ("Florida Digital"), pursuant to Rule 28-1-6.206 of the Florida Administrative Code and Rules 1.350 and 1.280 of the Florida Rules of Civil Procedure, hereby submits the following Responses and Objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Request for Production of Documents to Florida Digital Network

GENERAL OBJECTIONS

1. Florida Digital objects to each request to the extent that any response would require the inclusion of information protected by the attorney-client privilege, the work product doctrine, the joint defense privilege or any other discovery privilege recognized under the Florida Rules of Civil Procedure or other applicable Florida law.

2. Florida Digital objects to each request to the extent it seeks disclosure of trade secrets, confidential, or competitively confidential information. Florida Digital will only produce such information if required by law and upon the execution of an acceptable Confidentiality Agreement and/or Protective Order providing, among other things, that such information shall be used solely for purposes of these proceedings, and that access and distribution of such information will be strictly limited to those needing access for the purposes of these proceedings.

3. Florida Digital objects to BellSouth's instructions as unduly burdensome and overly broad because they appear to require Florida Digital to provide more information than

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might otherwise be required by law. Florida Digital will perform only those obligations required under Florida law related to the identification of privileged information.

4. Florida Digital objects to BellSouth data requests to the extent they seek information or documents that are not relevant to the subject matter of this proceeding and are not reasonably calculated to lead to the discovery of admissible evidence.

5. Florida Digital objects to the definition of "Florida Digital" to the extent that the definition seeks to impose an obligation on Florida Digital to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome and not permitted by applicable discovery rules. Without waiver of its general objections, and subject to other specific objections, responses will be provided on behalf of Florida Digital Network, which is the ALEC certificated to provide regulated telecommunications services in Florida and which is a party to this docket.

6. Florida Digital's specific objections and responses are set forth on the following pages.

INTERROGATORIES

Subject to, and without waiver of, the foregoing general objections, Florida Digital enters the following responses to BellSouth's request for the production of documents:

Request No. 1:

Produce all documents identified in response to BellSouth's First Set of Interrogatories.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to this interrogatory because the

request is unduly burdensome and overly broad, and because the request seeks confidential information.

Request No. 2:

Produce all documents furnished or provided by Florida Digital or on Florida Digital's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by Florida Digital for depreciation purposes for the switches, cable, and digital circuit equipment Florida Digital uses to provide telephone exchange service or interLATA service in Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to this interrogatory because the request is unduly burdensome and overly broad, and because the request seeks confidential information.

Request No. 3:

Produce all documents furnished or provided by Florida Digital or on Florida Digital's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by Florida Digital for depreciation purposes for fixed wireless equipment Florida Digital uses to provide telephone exchange service or interLATA service in Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of

admissible evidence. Furthermore, Florida Digital objects to this interrogatory because the request is unduly burdensome and overly broad, and because the request seeks confidential information.

Request No. 4:

Produce all documents furnished or provided by Florida Digital or on Florida Digital's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by Florida Digital for depreciation purposes for cable television plant or equipment Florida Digital uses to provide telephone exchange service or interLATA service in Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to this interrogatory because the request is unduly burdensome and overly broad, and because the request seeks confidential information.

Respectfully submitted the 28th day of June, 2000.



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Counsel for Florida Digital Networks

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into Pricing of) Docket No. 990649-TP
Unbundled Network Elements)
_____) Filed: June 28, 2000

**FLORIDA DIGITAL NETWORK'S
RESPONSES AND OBJECTIONS TO BELL SOUTH
TELECOMMUNICATIONS, INC.'S
FIRST SET OF INTERROGATORIES**

Florida Digital Network ("Florida Digital"), pursuant to Rule 28-106.206 of the Florida Administrative Code and Rules 1.340 and 1.280(b) of the Florida Rules of Civil Procedure, hereby submits the following Responses and Objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories to Florida Digital Network

GENERAL OBJECTIONS

1. Florida Digital objects to each interrogatory to the extent that any response would require the inclusion of information protected by the attorney-client privilege, the work product doctrine, the joint defense privilege or any other discovery privilege recognized under the Florida Rules of Civil Procedure or other applicable Florida law.

2. Florida Digital objects to each interrogatory to the extent it seeks disclosure of trade secrets, confidential, or competitively confidential information. Florida Digital will only produce such information if required by law and upon the execution of an acceptable Confidentiality Agreement and/or Protective Order providing, among other things, that such information shall be used solely for purposes of these proceedings, and that access and distribution of such information will be strictly limited to those needing access for the purposes of these proceedings.

3. Florida Digital objects to BellSouth's instructions as unduly burdensome and overly broad because they appear to require Florida Digital to provide more information than might otherwise be required by law. Florida Digital will perform only those obligations required under Florida law related to the identification of privileged information.

4. Florida Digital objects to BellSouth data requests to the extent they seek information or documents that are not relevant to the subject matter of this proceeding and are not reasonably calculated to lead to the discovery of admissible evidence.

5. Florida Digital objects to the definition of "Florida Digital " to the extent that the definition seeks to impose an obligation on Florida Digital to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome and not permitted by applicable discovery rules. Without waiver of its general objections, and subject to other specific objections, responses will be provided on behalf of Florida Digital Network, which is the ALEC certificated to provide regulated telecommunications services in Florida and which is a party to this docket.

6. Florida Digital's specific objections and responses are set forth on the following pages.

INTERROGATORIES

Subject to, and without waiver of, the foregoing general objections, Florida Digital enters the following responses to BellSouth's interrogatories:

Interrogatory No. 1:

Identify all persons participating in the preparation of the answers to these Interrogatories or supplying information used in connection therewith and describe the extent of each person's participation, including any information that person provided.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 2:

Does Florida Digital provide telephone exchange service in the State of Florida?

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 3:

If the answer to the foregoing Interrogatory is in the affirmative, please identify all counties in Florida where Florida Digital currently provides telephone exchange service, state the date when Florida Digital began providing such service, and describe with particularity the network Florida Digital uses to provide such service in Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Additionally, Florida Digital objects to this interrogatory because the request is unduly burdensome and overly broad.

Interrogatory No. 4:

Does Florida Digital own or operate any switches that it uses to provide telephone exchange service in the State of Florida?

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 5:

If the answer to the foregoing Interrogatory is in the affirmative, for each switch owned or operated by Florida Digital to provide telephone exchange service in the State of Florida, please:

- A. identify the location of each such switch;
- B. describe the type of switch (e.g. Digital Electronic, ATM);
- C. state the date when the switch was placed; and
- D. state the planned retirement date of each such switch

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to this interrogatory because it seeks confidential information.

Interrogatory No. 6:

If the answer to Interrogatory number 4 is in the affirmative, please provide the total investment of switches (by type of switch, if available) that Florida Digital owns or operates to provide telephone exchange service in the State of Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to this interrogatory because it seeks confidential information.

Interrogatory No. 7:

Please state the economic lives or useful lives used by Florida Digital for depreciation purposes for the switches it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of switch involved (e.g., Digital Electronic, ATM, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by Florida Digital for depreciation purposes for the switches it owns or operates to provide telephone exchange service in Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to this interrogatory because the request is unduly burdensome and overly broad, and because the request seeks confidential information.

Interrogatory No. 8:

Does Florida Digital own or operate any cable that it uses to provide telephone exchange service in the State of Florida?

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 9:

If the answer to the foregoing Interrogatory is in the affirmative, please:

- A. state the cable route miles currently in place;
- B. describe the type of cable in place (e.g. Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid/Coaxial Cable, etc.);

C. provide the total investment in cable (by type of cable, if available) that Florida Digital owns or operates to provide telephone exchange service in the State of Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to the request because it is unduly burdensome and overly broad, and because the request seeks confidential information.

Interrogatory No. 10:

Please state the economic lives or useful lives used by Florida Digital for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of cable involved (e.g., Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid/Coaxial Cable, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by Florida Digital for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 11:

Does Florida Digital own or operate any digital circuit equipment that it uses to provide telephone exchange service in the State of Florida?

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 12:

If the answer to the foregoing Interrogatory is in the affirmative, please:

- A. describe the type of digital circuit equipment in place (e.g. carrier, optical, amplification, signaling);
- B. provide the total investment in digital circuit equipment (by type of equipment, if available) that Florida Digital owns or operates to provide telephone exchange service in the State of Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 13:

Please state the economic lives or useful lives used by Florida Digital for depreciation purposes for the digital circuit equipment it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of digital circuit equipment involved (e.g. carrier, optical, amplification, signaling). In answering this Interrogatory, please

identify all documents referring or relating to the economic lives or useful lives used by Florida Digital for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 14:

Does Florida Digital provide interLATA service in the State of Florida?

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 15:

If the answer to the foregoing Interrogatory is in the affirmative, please identify all counties in Florida where Florida Digital currently provides interLATA service, state the date when Florida Digital began providing service, and describe with particularity the network Florida Digital uses to provide such service in Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to the interrogatory because the request is unduly burdensome and overly broad.

Interrogatory No. 16:

Does Florida Digital own or operate any switches that it uses to provide interLATA service in the State of Florida?

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 17:

If the answer to the foregoing is in the affirmative, for each switch owned or operated by Florida Digital to provide interLATA service in the State of Florida, please:

- A. identify the location of each such switch;
- B. describe the type of switch (e.g. Digital Electronic, ATM);
- C. state the date when the switch was placed; and
- D. state the planned retirement date of each such switch

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 18:

If the answer to the foregoing Interrogatory number 16 is in the affirmative, please provide the total investment of switches (by type of switch, if available) that Florida Digital owns or operates to provide interLATA service in the State of Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 19:

Please state the economic lives or useful lives used by Florida Digital for depreciation purposes for the switches it owns or operates to provide interLATA service in Florida, including the extent to which such lives vary depending upon the type of switch involved (e.g., Digital Electronic, ATM, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by Florida Digital for depreciation purposes for the switches it owns or operates to provide interLATA service in Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 20:

Does Florida Digital own or operate any cable that it uses to provide interLATA service in the State of Florida?

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 21:

If the answering to the foregoing Interrogatory is in the affirmative, please:

- A. state the cable route miles currently in place;
- B. describe the type of cable in place (e.g. Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid/Coaxial Cable, etc.);
- C. provide the total investment in cable (by type of cable, if available) that Florida Digital owns or operates to provide telephone exchange service in the State of Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Furthermore, Florida Digital objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 22:

Please state the economic lives or useful lives used by Florida Digital for depreciation purposes for the cable it owns or operates to provide interLATA service in Florida, including the extent to which such lives vary depending upon the type of switch involved (e.g., Digital Electronic, ATM, etc.).

In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by Florida Digital for depreciation purposes for the switches it owns or operates to provide interLATA service in Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 23:

Does Florida Digital own or operate any digital circuit equipment that it uses to provide interLATA service in the State of Florida?

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 24:

If the answer to the foregoing Interrogatory is in the affirmative, please:

- A. describe the digital circuit equipment in place (e.g., carrier, optical, amplification, signaling);
- B. provide the total investment in digital circuit equipment (by type of equipment, if available) that Florida Digital owns or operates to provide interLATA service in the State of Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 25:

Please state the economic lives or useful lives used by Florida Digital for depreciation purposes for the digital circuit equipment it owns or operates to provide interLATA service in Florida, including the extent to which such lives vary depending upon the type of digital circuit equipment involved. In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by Florida Digital for depreciation purposes for the digital circuit equipment it owns or operates to provide interLATA service in Florida.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Florida Digital objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 26:

Does Florida Digital currently offer or plan to offer fixed wireless service to provide telephone exchange service or interLATA service in Florida?

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 27:

If the answer to the foregoing Interrogatory is in the affirmative, please provide the economic lives or useful lives of the fixed wireless equipment (based on the classification of plant in Florida Digital's accounting records) which Florida Digital uses or expects to use to provide such service

in Florida. In answering this Interrogatory, please identify all documents referring or relating to such economic lives or useful lives.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Furthermore, Florida Digital objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Interrogatory No. 28:

Does Florida Digital currently provide or plan to provide telephone exchange service or interLATA service in Florida using cable television plant or equipment?

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 29:

If the answer to the foregoing Interrogatory is in the affirmative, please provide the economic lives or useful lives of the cable television plant or equipment (bases on the classification of plant in Florida Digital 's accounting records) which Florida Digital uses or expects to use to provide such service in Florida. In answering this Interrogatory, please identify all documents referring or relating to such economic lives or useful lives.

Response:

Florida Digital objects to this interrogatory because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Furthermore, Florida Digital objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Respectfully submitted this 28th day of June, 2000.



Marc B. Rothschild
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Telephone: (202) 424-7755
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Counsel for Florida Digital Networks

CERTIFICATE OF SERVICE

I, Robert Ridings, HEREBY CERTIFY that on the 28th day of June, 2000, a copy of the foregoing Response and Objections of Florida Digital Network, Inc. in Docket No. 990649-TP was served, via first-class mail, on the following parties:

@link Networks, Inc.
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ALLTEL Communications Services, Inc.
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Robert Ridings