3000 K Street, NW, Suite 300 Washington, DC 20007-5116 Telephone (202)424-7500 Facsimile (202) 424-7647



NEW YORK OFFICE 405 LEXINGTON AVENUE NEW YORK, NY 10174

LECEIVED-FPS

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: @Link Networks, Inc.'s Response to BellSouth's First Set of Interrogatories and First Request for Production of Documents in Docket No. 990649-TP

Dear Ms. Bayo:

Enclosed please find one original and fifteen copies of @Link Networks, 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.

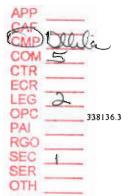
Sincerely,

more pettisette

Marc B. Rothschild Counsel for @Link Networks, Inc.

Enclosures

cc: Constance L. Kirkendall



RECEIVED & FILED BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07925 JUN 298

FPSC-RECORDS/REPORTING

ORIGINAL

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

# @LINK NETWORKS, INC.'S RESPONSES AND OBJECTIONS TO BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST SET OF INTERROGATORIES

@Link Networks, Inc. ("@Link"), 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 @Link Networks, Inc.

# **GENERAL OBJECTIONS**

1. @Link 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. @Link objects to each interrogatory to the extent it seeks disclosure of trade secrets, confidential, or competitively confidential information. @Link 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. @Link objects to BellSouth's instructions as unduly burdensome and overly broad because they appear to require @Link to provide more information than might otherwise be DOCUMENT NOMOER-DATE

07925 JUN 298 FPSC-RECORDS/REPORTING required by law. @Link will perform only those obligations required under Florida law related to the identification of privileged information.

4. @Link 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. @Link objects to the definition of "@Link" to the extent that the definition seeks to impose an obligation on @Link 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 @Link Networks Inc., which is the ALEC certificated to provide regulated telecommunications services in Florida and which is a party to this docket.

6. (a)Link's specific objections and responses are set forth on the following pages.

#### **INTERROGATORIES**

Subject to, and without waiver of, the foregoing general objections, @Link 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:

@Link 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.

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## Interrogatory No. 2:

Does @Link provide telephone exchange service in the State of Florida?

#### Response:

@Link 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 @Link currently provides telephone exchange service, state the date when @Link began providing such service, and describe with particularity the network @Link uses to provide such service in Florida.

# Response:

@Link 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, @Link objects to this interrogatory because the request is unduly burdensome and overly broad.

#### Interrogatory No. 4:

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

### Response:

@Link 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.

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#### Interrogatory No. 5:

If the answer to the foregoing Interrogatory is in the affirmative, for each switch owned or operated by @Link 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:

@Link 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, @Link 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 @Link owns or operates to provide telephone exchange service in the State of Florida.

#### Response:

@Link 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, @Link objects to this interrogatory because it seeks confidential information.

#### **Interrogatory No. 7**:

Please state the economic lives or useful lives used by @Link 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 @Link for depreciation purposes for the switches it owns or operates to provide telephone exchange service in Florida.

## Response:

@Link 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, @Link objects to this interrogatory because the request is unduly burdensome and overly broad, and because the request seeks confidential information.

### **Interrogatory No. 8**:

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

### Response:

@Link 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 @Link owns or operates to provide telephone exchange service in the State of Florida.

@Link 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, @Link 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 @Link 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 @Link for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida.

## Response:

@Link 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, @Link objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

### Interrogatory No. 11:

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

-6-

@Link 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 @Link owns or operates to provide telephone exchange service in the State of Florida.

## Response:

@Link 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, @Link 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 @Link 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 @Link for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida.

@Link 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, @Link objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

# Interrogatory No. 14:

Does @Link provide interLATA service in the State of Florida?

## Response:

@Link 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 @Link currently provides interLATA service, state the date when @Link began providing service, and describe wit particularity the network @Link uses to provide such service in Florida.

### Response:

@Link 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, @Link objects to the interrogatory because the request is unduly burdensome and overly broad.

### Interrogatory No. 16:

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

@Link 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 @Link 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:

@Link 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, @Link 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 @Link owns or operates to provide interLATA service in the State of Florida.

#### Response:

@Link 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, @Link 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 @Link 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 @Link for depreciation purposes for the switches it owns or operates to provide interLATA service in Florida.

# Response:

@Link 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, @Link objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

# Interrogatory No. 20:

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

#### Response:

@Link 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 @Link owns or operates to provide telephone exchange service in the State of Florida.

@Link 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, @Link 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 @Link 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 @Link for depreciation purposes for the switches it owns or operates to provide interLATA service in Florida.

## Response:

@Link 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, @Link objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

## Interrogatory No. 23:

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

### Response:

@Link 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 @Link owns or operates to provide interLATA service in the State of Florida.

## Response:

@Link 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, @Link 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 @Link for depreciation purposes for the digital circuit equipment it owns or operates to provide interLATA service in Florida, including the extnet 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

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or useful lives used by @Link for depreciation purposes for the digital circuit equipment it owns or operates to provide interLATA service in Florida.

## Response:

@Link 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, @Link objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

## Interrogatory No. 26:

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

### Response:

@Link 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 (bases on the classification of plant in @Link's accounting records) which @Link 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:

@Link 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, @Link objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

# Interrogatory No. 28:

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

# Response:

@Link 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 @Link 's accounting records) which @Link 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:

@Link 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, @Link objects to the interrogatory because the request is unduly burdensome and overly broad, and because the interrogatory seeks confidential information.

Respectfully submitted this 28<sup>th</sup> day of June, 2000.

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Marc B. Rothschild Swidler Berlin Shereff Friedman, LLP 3000 K Street, NW, Suite 300 Washington, D.C. 20007-5116 Telephone: (202) 424-7755 Facsimile: (202) 424-7643

Counsel for @Link Networks, Inc.

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Investigation into Pricing of Unbundled Network Elements Docket No. 990649-TP

Filed: June 28, 2000

# @LINK NETWORKS, INC.'S RESPONSES AND OBJECTIONS TO BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

@Link Networks, Inc. ("@Link"), 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 @Link Networks, Inc.

# **GENERAL OBJECTIONS**

1. @Link 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. @Link objects to each request to the extent it seeks disclosure of trade secrets, confidential, or competitively confidential information. @Link 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. @Link objects to BellSouth's instructions as unduly burdensome and overly broad because they appear to require @Link to provide more information than might otherwise be

required by law. @Link will perform only those obligations required under Florida law related to the identification of privileged information.

4. @Link 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. @Link objects to the definition of "@Link" to the extent that the definition seeks to impose an obligation on @Link 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 @Link Networks, Inc., which is the ALEC certificated to provide regulated telecommunications services in Florida and which is a party to this docket.

6. @Link's specific objections and responses are set forth on the following pages.

#### **INTERROGATORIES**

Subject to, and without waiver of, the foregoing general objections, @Link 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:

@Link 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, @Link objects to this interrogatory because the request is unduly burdensome and overly broad, and because the request seeks confidential information.

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### Request No. 2:

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

# Response:

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

## Response:

@Link 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, @Link 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 @Link or on @Link's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or

-3-

useful lives used by @Link for depreciation purposes for cable television plant or equipment

@Link uses to provide telephone exchange service or interLATA service in Florida.

## Response:

@Link 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, @Link objects to this interrogatory because the request is unduly burdensome and overly broad, and because the request seeks confidential information.

Respectfully submitted the 28<sup>th</sup> day of June, 2000.

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Marc B. Rothschild Swidler Berlin Shereff Friedman, LLP 3000 K Street, NW, Suite 300 Washington, D.C. 20007-5116 Telephone: (202) 424-7755 Facsimile: (202) 424-7643

Counsel for @Link Networks, Inc.

### **CERTIFICATE OF SERVICE**

I, Robert Ridings, HEREBY CERTIFY that on the 28<sup>th</sup> day of June, 2000, a copy of the foregoing Response and Objections of @Link Networks, Inc. in Docket No. 990649-TP was served, via first-class mail, on the following parties:

@link Networks, Inc.
Constance Kirkendall
2220 Campbell Creek Blvd., Suite 110
Richardson, TX 75082-4420

ACI Corp. 7337 S. Revere Parkway Englewood, CO 80112 Phone: (303) 476-4200 Fax: (303) 476-4201

ALLTEL Communications Services, Inc. One Allied Drive Little Rock, AR 72203-2177 Phone: (501) 905-7085

AT&T Communications of the Southern States, Inc. Ms. Tracy Hatch 101 North Monroe Street, Suite 700 Tallahassee, FL 32301-1549

Ausley Law Firm Jeffrey Wahlen P.O. Box 391 Tallahassee, FL 32302

BellSouth Telecommunications, Inc. Ms. Nancy B. White c/o Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556

BlueStar Networks, Inc. Norton Cutler/Michael Bressman 401 Church Street, 24th Floor Nashville, TN 37210 Blumenfeld & Cohen Elise Kiely/Jeffrey Blumenfeld 1615 Massachusetts Ave. NW Suite 700 Washington, DC 20036

Broadslate Networks of Florida, Inc. John Spilman 675 Peter Jefferson Parkway, Suite 310 Charlottesville, VA 22911

Covad Communications Company Christopher V. Goodpaster 9600 Great Hills Trail, Suite 150 W Austin, TX 78759

e.spire Communications James Falvey 133 National Business Parkway Suite 200 Annapolis Junction, MD 20701

Florida Cable Telecommunications Assoc., Inc. Michael A. Gross 310 N. Monroe St. Tallahassee, FL 32301

Florida Competitive Carriers Assoc. c/o McWhirter Law Firm Joseph McGlothlin/Vicki Kaufman 117 S. Gadsden St. Tallahassee, FL 32301

Florida Digital Network, Inc. 390 North Orange Ave., Suite 2000 Orlando, FL 32801 Phone: (407) 895-8240 Fax: (407) 835-0309

Florida Public Telecommunications Assoc. Angela Green, General Counsel 125 S. Gadsden St., #200 Tallahassee, FL 32301-1525 Global NAPS, Inc. 10 Merrymount Road Quincy, MA 02169

GTE Florida Incorporated Kimberly Caswell P.O. Box 110, FLTC0007 Tampa, FL 33601-0110

Holland Law Firm Bruce May P.O. Drawer 810 Tallahassee, FL 32302

Hopping Law Firm Richard Melson/Gabriel E. Nieto P.O. Box 6526 Tallahassee, FL 32314

Intermedia Communications, Inc. Scott Sappersteinn 3625 Queen Palm Drive Tampa, FL 33619-1309

Kelley Law Firm Jonathan Canis/Michael Hazzard 1200 19th St. NW, Fifth Floor Washington, DC 20036

KMC Telecom, Inc. John McLaughlin Suite 170 3025 Breckinridge Blvd. Duluth, GA 30096

MCI WorldCom Ms. Donna C. McNulty 325 John Knox Road, Suite 105 Tallahassee, FL 32303-4131

MCI WorldCom, Inc. Mr. Brian Sulmonetti Concourse Corporate Center Six Six Concourse Parkway, Suite 3200 Atlanta, GA 30328 McWhirter Law Firm Vicki Kaufman 117 S. Gadsden St. Tallahassee, FL 32301

MediaOne Florida Telecommunications, Inc. c/o Laura L. Gallagher, P.A. 101 E. College Ave., Suite 302 Tallahassee, FL 32301

Messer Law Firm Norman Horton, Jr. P.O. Box 1876 Tallahassee, FL 32302

Moyle Law Firm(Tall) Jon Moyle/Cathy Sellers The Perkins House 118 North Gadsden Street Tallahassee, FL 32301

Network Access Solutions Corporation 100 Carpenter Drive, Suite 206 Sterling, VA 20164

NorthPoint Communications, Inc. Glenn Harris, Esq. 222 Sutter Street, 7th Floor San Francisco, CA 94108

Office of Public Counsel Stephen C. Reilly c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400

Pennington Law Firm Marc W. Dunbar P.O. Box 10095 Tallahassee, FL 32302 Shook, Hardy & Bacon LLP Rodney L. Joyce 600 14th Street, N.W., Suite 800 Washington, DC 20005-2004

Sprint Communications Company Limited Partnership 3100 Cumberland Circle Mailstop GAATLN0802 Atlanta, GA 30339

Sprint-Florida, Incorporated Charles J. Rehwinkel 1313 Blairstone Road Tallahassee, FL 32301-3021

Supra Telecommunications and Information Systems, Inc. Mark E. Buechele Koger Center – Ellis Bldg. 1311 Executive Center Dr., Suite 200 Tallahassee, FL 32301-5027

Swidler & Berlin Law Firm Russell Blau/Marc Rothschild 3000 K Street, NW, #300 Washington, DC 20007-5116

Swidler & Berlin Law Firm Eric J. Branfmann/Martin Posner 3000 K Street, NW, #300 Washington, DC 20007-5116

Time Warner Telecom of Florida, L.P. Carolyn Marek 233 Bramerton Court Franklin, TN 37069

Wiggins Law Firm Charles J. Pellegrini P.O. Drawer 1657 Tallahassee, FL 32302 Z-Tel Communications, Inc. George S. Ford 601 S. Harbour Island Blvd. Tampa, FL 33602-5706

a. t Robert Ridings · · ·