LAW OFFICES

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A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701 POST OFFICE BOX 1876 TALLAHASSEE, FLORIDA 32302-1876 TELEPHONE: (850) 222-0720 TELECOPIER: (850) 224-4359 INTERNET: www.lawfla.com

September 15, 2000

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### **BY HAND DELIVERY**

Ms. Blanca Bayó, Director Division of Records and Reporting Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

> FPSC Docket No. 990649-TP: Re: Discovery Responses to Staff's 3<sup>rd</sup> Request for Production of Documents and 4<sup>th</sup> Set of Interrogatories Notice of Intent to Seek Confidential Classification

Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, Inc. and MCI WorldCom, Inc. are an original and one copy of the Notice of Service of AT&T Communications of the Southern States, Inc.'s and MCI WorldCom, Inc.'s Joint Responses to FPSC Staff's Third Request for Production of Documents and FPSC Staff's Fourth Set of Interrogatories in the abovereferenced docket.

Also attached is an envelope containing the confidential version of the responses. Pursuant to Rule 25-22.006, Florida Administrative Code, AT&T and MCI WorldCom respectfully request that the indicated confidential information be treated as confidential until the appropriate request for confidential classification can be filed. Because all of the claimed confidential information is proprietary BellSouth information, we will coordinate with BellSouth for it to file the appropriate confidential request.

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access it.

DOCUMENT NUMBER-DATE 1633 SEP 158 FPSC-RECORDS/REPORTING Ms. Blanca Bayó September 15, 2000 Page 2

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Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

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Thank you for your assistance with this filing.

Singerely R. Self Flo

FRS/amb Enclosure cc: Jim Lamoureux, Esq. Parties of Record

### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into pricing of unbundled network elements

Docket No. 990649-TP Filed: September 15, 2000

# AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC. AND MCI WORLDCOM, INC.'S NOTICE OF SERVING JOINT RESPONSES TO FPSC STAFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS AND <u>FOURTH SET OF INTERROGATORIES</u>

AT&T Communications of the Southern States, Inc. and MCI WorldCom, Inc., by and through their undersigned counsel, hereby file and serve Notice that they have served their Responses to FPSC Staff's Third Request for Production of Documents and Fourth Set of Interrogatories by hand delivery on Beth Keating, Esq., Room 370, Gunter Building, Florida Public Service Commission, 2540 Shumard Oak. Blvd., Tallahassee, FL 32399-0850, on this 15th day of September, 2000.

Respectfully submitted,

FLOYD R. SELF, ESQ. MESSER, QAPARELLO & SELF, P. A. Post Office Box 1876 Tallahassee, FL 32302-1876 (850) 222-0720

Jim Lamoureux, Esq. AT&T 1200 Peachtree St., Suite 8068 Atlanta, GA 30309

Attorneys for AT&T Communications .of the Southern States, Inc.

and

Donna Canzano McNulty, Esq. MCI WorldCom, Inc. The Atrium Building, Suite 105 325 John Knox Road Tallahassee, FL 32303

Attorney for MCI WorldCom, Inc.

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of AT&T's and MCI WorldCom's Notice of Service of Joint Responses to FPSC Staff's Third Request for Production of Documents and FPSC Staff's Fourth Set of Interrogatories in Docket No. 990649-TP has been furnished by Hand Delivery (\*) and/or Overnight Delivery to the following parties of record this 15th day of September, 2000:

Beth Keating, Esq.\* Division of Legal Services Room 370, Gunter Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Ms. Sue Ollila.\* Division of Competitive Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

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

Mark E. Buechele\* Supra Telecommunications & Information Systems, Inc. Koger Center-Ellis Building, Suite 200 1311 Executive Center Drive Tallahassee, FL 32301-5027

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

Angela Green, Esq.\* Florida Public Telecommunications Association 125 S. Gadsden St., Suite 200 Tallahassee, FL 32301

Patrick Wiggins, Esq.\* Charles Pellegrini, Esq. Wiggins and Villacorta, P.A. P.O. Drawer 1657 Tallahassee, FL 32302

Catherine Boone, Esq. Covad Communications Company 10 Glenlake Parkway, Suite 650 Atlanta, GA 30328

Marsha Rule, Esq.\* AT&T 101 N. Monroe St., Suite 700 Tallahassee, FL 32301

Charles A. Hudak, Esq. Jeremy D. Marcus, Esq. Gerry, Friend & Sapronov, LLP Three Ravina Drive, Suite 1450 Atlanta, GA 30346-2131 Monica M. Barone Sprint Communications Company Limited Partnership Mailstop GAATLN0802 3100 Cumberland Circle Atlanta, GA 30339

Charles J. Rehwinkel\* Sprint-Florida, Incorporated MC FLTHO0107 P.O. Box 2214 Tallahassee, FL 32399-2214

Richard D. Melson\* Gabriel E. Nieto Hopping Green Sams & Smith, P.A. P.O. Box 6526 Tallahassee, FL 32314

Vicki Kaufman, Esq.\* Joe McGlothlin, Esq. McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. 117 S. Gadsden Street Tallahassee, FL. 32301

Jeremy Marcus Kristin Smith Blumenfeld & Cohen 1625 Massachusetts Ave., NW, Suite 300 Washington, DC 20036

Peter M. Dunbar, Esq.\* Marc W. Dunbar, Esq. Pennington, Moore, Wilkinson & Dunbar, P.A. P.O. Box 10095 Tallahassee, FL 32302

Carolyn Marek V.P. of Regulatory Affairs Southeast Region Time Warner Communications 233 Bramerton Court Franklin, TN 37069

Michael A. Gross\* Vice President, Regulatory Affairs & Regulatory Counsel Florida Telecommunications Association, Inc. 310 North Monroe St. Tallahassee, FL 32301

Terry Monroe CompTel 1900 M Street, NW, Suite 800 Washington, DC 20036 Mr. Brian Sulmonetti MCI WorldCom, Inc. 6 Concourse Parkway, Suite 3200 Atlanta, GA 30328

Donna McNulty\* MCI WorldCom The Atrium Building, Suite 105 325 John Knox Road Tallahassee, FL 32303

Genevieve Morelli Eric D. Jenkins Kelley Drye & Warren, LLP 1200 19<sup>th</sup> street, N.W., Suite 500 Washington, DC 20036

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

Bettye Willis ALLTEL Communications Services, Inc. One Allied Drive Little Road, AR 72203-2177

J. Jeffry Wahlen\* Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302

BlueStar Networks, Inc. Norton Cutler/Michael Bressman 401 Church Street, 24th Floor Nashville, TN 37210

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

Cleartel Communications, Inc. Hope G. Colantonio 1255 22nd Street, N.W., 6th Floor Washington, DC 20037

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

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

Shook, Hardy & Bacon LLP Rodney L. Joyce 600 14th Street, N.W., Suite 800 Washington, DC 20005-2004 Brent E. McMahan Vice President-Regulatory and Government Affairs Network Telephone Corporation 815 South Palafox Street Pensacola, FL 32501

Marc B. Rothschild Robert Ridings Swidler Berlin Shereff Friedman, LLP 3000 K Street, NW, Suite 300 Washington, DC 20007-5116

Z-Tel Communications, Inc. George S. Ford 601 S. Harbour Island Blvd. Tampa, FL 33602-5706

Mr. John C. Donovan Telecom Visions, Inc. 11 Osborne Road Garden City, NY 11530

Mr. Greg Darnell MCI WorldCom, Inc. 6 Concourse Parkway, Suite 3200 Atlanta, GA 30328

Mr. Brian F. Pitkin Klick, Kent & Allen, Inc. 66 Canal Center Plaza, Suite 670 Alexandria, VA 22314

Ms. Catherine Pitts AT&T Communications 295 North Maple Avenue Basking Ridge, NJ 07920-1025

Dr. Brenda J. Kahn AT&T 900 Routes 202/206 Bedminster, NJ 07921

Mr. Jeffrey King AT&T 1200 Peachtree Street, NE Atlanta, GA 30309

Floyd R. Self