BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

Petition of Level 3 Communications, LLC   )
for arbitration of certain terms and   )   Docket No. 000907-TP
conditions of proposed agreement with   )
BellSouth Telecommunications, Inc.   )

LEVEL 3 COMMUNICATIONS, LLC'S FIRST
REQUESTS FOR ADMISSIONS TO
BELLSOUTH TELECOMMUNICATIONS, INC. (NOS. 1-5)

Pursuant to Rule 1.370, Florida Rules of Civil Procedures, and Rule 28-106.206, Florida

Administrative Code, Level 3 Communications, LLC ("Level 3") hereby propounds this First

Request for Admissions upon BellSouth Telecommunications, Inc. ("BellSouth").

Level 3 requests that BellSouth admit the truth of the following within twenty (20) calendar

days of receipt of these requests for admissions in accordance with Order No. PSC-00-1646-PCO-TP

issued September 15, 2000 in this docket.

REQUESTS FOR ADMISSIONS

1.   Please admit that the description of "FX" provided in Attachment 1 to Level 3's First

Set of Interrogatories is accurate. If you do not so admit, please explain in detail your reasons for

not so admitting, and state all facts and produce all documents that support those reasons.

2.   Please admit that the definitions of Local Channel, Serving Wire Center, and

Dedicated Interoffice Transport in Section 1.2 would preclude Level 3 from assessing BellSouth

charges for Dedicated Interoffice Transport if Level 3 has deployed only one switch in the LATA

where the parties have interconnected their networks. If you do not so admit, please explain how

Level 3 would be permitted to charge BellSouth for Dedicated Interoffice Transport.

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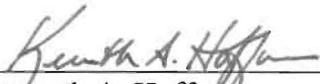
3.   Please admit that Level 3 adopted the MCI interconnection agreement and that the parties are currently interconnected and operating under the terms of the MCI agreement. If you do not so admit, please explain your answer, including, but not limited to, why you disagree with the preceding statement.

4.   Please admit that the Commission has required BellSouth to pay MCI reciprocal compensation for locally-dialed ISP-bound traffic by Order No. PSC-98-1216-FOF-TP, issued September 15, 1998. If you do not so admit, please explain your answer, including, but not limited to, why you disagree with the preceding statement.

5.   Please admit that Level 3 has billed, but BellSouth has not paid, reciprocal compensation for locally-dialed ISP-bound calls delivered to Level 3 under the parties' current interconnection agreement. If you do not so admit, please explain your answer, including, but not limited to, any claim that BellSouth has paid reciprocal compensation billed by Level 3 and any other reasons BellSouth has refused to pay the reciprocal compensation bills submitted by Level 3.

RESPECTFULLY SUBMITTED this _3/_ day of __October__ , 2000.

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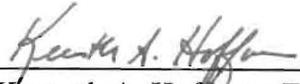
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by hand delivery(*)
and United States Mail to the following this _31_ day of _October_, 2000:

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c/o Nancy Sims
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