

SEARCHED  
FILE COPY

**Nancy B. White**  
Assistant General Counsel-Florida

**BellSouth Telecommunications, Inc.**  
c/o Nancy H. Sims  
Suite 400  
150 South Monroe Street  
Tallahassee, Florida 32301  
Telephone (305) 347-5558

August 1, 1997

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 960786-TL - (Section 271)**

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. serviced its First Set of Interrogatories (Nos. 1-4) to Intermedia Communications, Inc. in the above captioned docket.

Sincerely,

*Nancy B. White*  
(NW)

Nancy B. White

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LED \_\_\_\_\_
- MT \_\_\_\_\_
- S \_\_\_\_\_
- W-S \_\_\_\_\_
- OTM \_\_\_\_\_

Enclosures  
/vf

cc: All parties of record  
A. M. Lombardo  
R. G. Beatty  
William J. Ellenberg II

RECEIVED & FILED  
*W*

DOCUMENT NUMBER-DATE

07823 AUG-16

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 960786-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 1st day of August, 1997 to the following:

Mr. Brian Sulmonetti  
LDDS WorldCom Communications  
Suite 400  
1515 S. Federal Highway  
Boca Raton, FL 33432  
(407) 750-2529

Floyd R. Self, Esq.  
Norman H. Horton, Esq.  
Messer, Caparello, Madsen,  
Goldman & Metz, P.A.  
215 South Monroe Street  
Suite 701  
P.O. Box 1876  
Tallahassee, FL 32302-1876  
Atty. for LDDS WorldCom Comm.  
(904) 222-0720

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
Atty. for FCCA  
(904) 222-2525

Thomas K. Bond  
MCI Telecommunications Corp.  
780 Johnson Ferry Road  
Suite 700  
Atlanta, GA 30342  
(404) 267-6315

Richard D. Melson  
Hopping Green Sams & Smith  
123 South Calhoun Street  
P.O. Box 6526  
Tallahassee, FL 32314  
(904) 222-7500

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs,  
Odom & Ervin  
305 South Gadsden Street  
P.O. Drawer 1170  
Tallahassee, FL 32302  
Atty. for Sprint  
(904) 224-9135

Benjamin W. Fincher  
3100 Cumberland Circle  
Atlanta, Georgia 30339  
Atty. for Sprint  
(404) 649-5145

Monica Barone  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Patrick K. Wiggins, Esq.  
Donna L. Canzano, Esq.  
Wiggins & Villacorta, P.A.  
501 East Tennessee Street  
Suite B  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
Tel. (904) 222-1534  
Fax. (904) 222-1689  
Attys. for Intermedia

Patricia Kurlin  
Intermedia Comm., Inc.  
3625 Queen Palm Drive  
Tampa, Florida 33619-1309  
(813) 829-0011

Peter M. Dunbar, Esq.  
Robert S. Cohen, Esq.  
Pennington, Culpepper, Moore,  
Wilkinson, Dunbar &  
Dunlap, P.A.  
215 South Monroe Street  
2nd Floor  
Post Office Box 10095  
Tallahassee, FL 32302  
(904) 222-3533

Sue E. Weiske, Esq.  
Time Warner Communications  
160 Inverness Drive West  
2nd Floor North  
Englewood, Colorado 80112  
(303) 799-5513

Tracy Hatch, Esq.  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
(904) 425-6364

Marsha E. Rule, Esq.  
c/o Doris M. Franklin  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301

Andrew O. Isar  
Director - Industry Relations  
Telecomm. Resellers Assoc.  
4312 92nd Avenue, N.W.  
P.O. Box 2461  
Gig Harbor, WA 98335-4461  
(206) 265-3910

Richard M. Rindler  
Swindler & Berlin, Chartered  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007  
Tel. (202) 424-7771  
Fax. (202) 424-7645

Kenneth A. Hoffman, Esq.  
William B. Willingham, Esq.  
Rutledge, Ecenia, Underwood,  
Purnell & Hoffman, P.A.  
215 South Monroe Street  
Suite 420  
Tallahassee, FL 32301-1841  
(850) 681-6788

Mr. Paul Kouroupas  
TCG-Washington  
2 Lafayette Centre  
1133 Twenty First Street, N.W.  
Suite 400  
Washington, D.C. 20036  
(202) 739-0030

*Nancy B. White*  
Nancy B. White (P.O.)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of  
BellSouth Telecommunications, )  
Inc. entry into InterLATA ) Docket No. 960786-TL  
Services pursuant to Section 271 )  
of the Federal Telecommunications ) Filed: August 1, 1997  
Act of 1996 )  
\_\_\_\_\_)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
NOTICE OF SERVICE OF FIRST SET OF INTERROGATORIES (Nos. 1-4)  
TO INTERMEDIA COMMUNICATIONS, INC.**

BellSouth Telecommunications, Inc. ("BellSouth") files Notice that it has served its First Set of Interrogatories (Nos. 1-4) to Intermedia Communications, Inc. ("Intermedia") by Federal Express to Patrick K. Wiggins, Esq. and Donna L. Canzano, Esq., Wiggins & Villacorta, P.A., 501 East Tennessee Street, Suite B, Post Office Drawer 1657, Tallahassee, Florida 32302 and that a copy has been provided to the parties listed below on this 1st day of August, 1997 in the manner shown.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Robert G. Beatty (for)*  
ROBERT G. BEATTY  
NANCY B. WHITE  
c/o Nancy Sims  
150 South Monroe Street, #400  
Tallahassee, Florida 32301  
(305)347-5555

*William J. Ellenberg II (for)*  
WILLIAM J. ELLENBERG II  
J. PHILLIP CARVER  
JONATHAN B. BANKS  
675 West Peachtree Street, #4300  
Atlanta, Georgia 30375  
(404)335-0711

FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of  
 BellSouth Telecommunications, )  
 Inc. entry into InterLATA ) Docket No. 960786-TL  
 Services pursuant to Section 271 )  
 of the Federal Telecommunications ) Filed: August 1, 1997  
 Act of 1996 )  
 \_\_\_\_\_ )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
 FIRST SET OF INTERROGATORIES TO  
INTERMEDIA COMMUNICATIONS, INC.**

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), by and through its attorneys, and hereby propounds the following interrogatories to Intermedia Communications, Inc. ("Intermedia") to be answered under oath in full accordance with Rule 25-22.035 and 25-22.037, Florida Administrative Code, and Rule 1.340, Florida Rules of Civil Procedure. Each interrogatory should be answered based upon actual knowledge or information or belief and should state that it is given on such basis. If the complete answer to an interrogatory is not known, so state and answer as fully as possible the part of the interrogatory to which the answer is known. For each answer, or part thereof, please identify the individual or individuals who provided the information or assisted in providing the information contained in the responses. If the individual or individuals so identified will not be a witness during hearings in this docket, please also identify a witness or witnesses sponsored by Intermedia who will be responsible for each answer or part thereof.

DOCUMENT NO.  
 07823-97

If the response to any interrogatory is that the information requested is not currently available, state when the information requested will be available.

DEFINITIONS

1. Intermedia Communications, Inc. ("Intermedia") means the entity to which these Interrogatories are addressed, its parents, predecessors, successors, subsidiaries, divisions, departments, affiliates, and other persons acting on behalf of any of them, including any consultants, attorneys, or other agents having knowledge relevant to any of the interrogatories set out below.

2. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to bring within the scope of these interrogatories any information that might otherwise be construed outside their scope.

3. "You", "your", "Company" or "Intermedia" refers to Intermedia Communications, Inc., their employees and authorized agents.

INTERROGATORIES

1. If Intermedia is providing telephone exchange service to residential subscribers other than through resale of BellSouth services, identify:

(a) for each month to date in 1997, the number of residential subscribers and the number of subscriber lines by city in Florida, separately identifying the number of subscribers and lines for which Intermedia charges a fee and those for which it does not;

(b) for each month to date in 1997, total monthly billings for residential service;

(c) the network arrangements for providing residential telephone exchange service, separately identifying network arrangements where they differ;

(d) all network facilities that are used to provide residential telephone exchange service, including whether each facility is owned, leased or purchased.

2. If Intermedia is providing telephone exchange service to business subscribers other than through resale of BellSouth services, identify:

(a) for each month to date in 1997, the number of business subscribers and the number of subscriber lines by city in Florida separately identifying the number of subscribers and lines for which Intermedia charges a fee and those for which it does not;

(b) for each month to date in 1997, total monthly billings for business service;

(c) separately the number of customers, lines and billings in multiple-family dwelling units and in single-family;

(d) the network arrangements for providing business telephone exchange service, separately identifying network arrangements where they differ;

(e) all network facilities that are used to provide business telephone exchange service, including whether each facility is owned, leased or purchased.

3. If Intermedia provides residential telephone exchange service through resale of BellSouth services, identify:

(a) for each month to date in 1997, the number of subscribers, the number of resold lines by city in Florida separately identifying the number of subscribers and lines for which Intermedia charges a fee and those for which it does not;

(b) for each month to date in 1997, total monthly billings;

(c) list all services and features resold.

4. If Intermedia provides business telephone exchange service through resale of BellSouth services, identify:

(a) for each month to date in 1997, the number of subscribers, the number of resold lines by city in Florida separately identifying the number of subscribers and lines for which Intermedia charges a fee and those for which it does not;

(b) for each month to date in 1997, total monthly billings;

(c) list all services and features resold.



Respectfully submitted this 1st day of August, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Robert G. Beatty (pw)*

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305)347-5555

*William J. Ellenberg II (pw)*

WILLIAM J. ELLENBERG II

J. PHILLIP CARVER

JONATHAN B. BANKS

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404)335-0711