

STATE OF FLORIDA

ANK

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIA L. JOHNSON
E. LEON JACOBS, JR.



DIVISION OF LEGAL SERVICES
NOREEN S. DAVIS
DIRECTOR
(850) 413-6199

Public Service Commission

September 2, 1999

Michael P. Goggin, Esquire
BellSouth Telecommunications, Inc.
150 West Flagler Street
Suite 1910
Miami, Florida 33130

Re: Docket No. 990750-TP

Dear Mr. ^{Michael}Goggin:

Please find attached Staff's First Request for Production of Documents and Staff's First Set of Interrogatories to BellSouth Telecommunications, Inc. Pursuant to my conversation with Tom Alexander yesterday, staff is requesting expedited response to discovery. Please return the discovery within 20 days rather than 30 (plus five days for mailing). Please do not hesitate to call me if you have any questions.

Sincerely,

Diana W. Caldwell

Diana W. Caldwell
Senior Attorney, Legal Services
Division

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- MAS _____
- OPC _____
- PAI _____
- SEC _____
- WAW _____
- OTH _____

DWC
Attachments
cc: All Parties of Record
Division of Records and Reporting
Division of Communications (Favors)

DOCUMENT NUMBER - DATE

10591 SEP-2-99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by ITC^DeltaCom
Communications, Inc. d/b/a
ITC^DeltaCom for arbitration of
certain unresolved issues in
interconnection negotiations
between ITC^DeltaCom and
BellSouth Telecommunications,
Inc.

DOCKET NO. 990750-TP

FILED: SEPTEMBER 2, 1999

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of Staff's First Request for Production of Documents (Nos. 1 - 6) have been served **VIA U.S. MAIL**, to Michael P. Goggin, Esquire, 150 West Flagler Street, Suite 1910, Miami, FLorida 33130, on behalf of BellSouth Telecommunications, Inc., this 2nd day of September, 1999, and that a true and correct copy thereof has been furnished by U.S. Mail to the following:

J. Andrew Bertron, Jr., Esquire
Huey Law Firm
P.O. Box 1794
Tallahassee, FL 32302

Ms. Nanette Edwards
ITC^DeltaCom
700 Boulevard South
Suite 107
Huntsville, AL 35802

Nancy B. White, Esquire
c/o Ms. Nancy H. Sims
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301-1556

CERTIFICATE OF SERVICE
DOCKET NO. 990750-TP

Sutherland Asbill & Brennan LLP
Mr. David I. Adelman
Mr. Charles B. Jones
999 Peachtree Street
Atlanta, GA 30309-3996

Diana W. Caldwell
DIANA W. CALDWELL
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(850) 413-6199

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DOCKET NO. 990750-TP

FILED: SEPTEMBER 2, 1999

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of Staff's First Set of Interrogatories (Nos. 1 - 26) have been served **VIA U.S. MAIL**, to Michael P. Goggin, Esquire, 150 West Flagler Street, Suite 1910, Miami, Florida 33130, on behalf of BellSouth Telecommunications, Inc., this 2nd day of September, 1999, and that a true and correct copy thereof has been furnished by U.S. Mail to the following:

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Diana W. Caldwell

DIANA W. CALDWELL
Staff Counsel

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