

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate )  
methods to compensate carriers for )  
exchange of traffic subject to Section 251 )  
of the Telecommunications Act of 1996. )  
\_\_\_\_\_)

Docket No. 000075-TP

Filed: February 26, 2001

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES,  
INC.'S AMENDED OBJECTION TO BELL SOUTH  
TELECOMMUNICATIONS, INC.'S FIRST SET  
OF INTERROGATORIES NO. 6**

AT&T Communications of the Southern States, Inc. ("AT&T"), by and through its undersigned counsel, and pursuant to the Order Establishing Procedure (PSC-00-2229-PCO-TP), files this Amended Objection to BellSouth Telecommunications, Inc.'s ("BellSouth") Interrogatory Number 6 of its First Set of Interrogatories dated February 2, 2001, and states.

1. Interrogatory No. 6 in BellSouth's First Set of Interrogatories states as follows:

Has AT&T requested that any state commission outside of BellSouth's region arbitrate, pursuant to Section 252 of the Telecommunications Act of 1996, any of the issues raised in the generic ISP proceeding? If the answer to this interrogatory is in the affirmative, please identify the specific issue on which arbitration was sought; identify the state commission before which AT&T sought arbitration, including the case name, docket number, and date the petition was filed; and describe with particularity the state commission's resolution of the issue and identify the state commission Order in which such resolution was made.

2. On February 12, 2001, AT&T filed a specific objection to BellSouth's Interrogatory No. 6. The basis for AT&T's objection is that the information requested is overly broad and unduly burdensome, and the requested information is available to BellSouth in publicly filed documents. AT&T further stated in the specific objection to BellSouth's Interrogatory No. 6 that AT&T would identify any state commission outside of BellSouth's region wherein AT&T requested the Commission to arbitrate the issues raised in this generic ISP proceeding.

DOCUMENT NUMBER-DATE

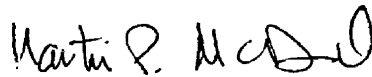
02629 FEB 26 2001

FPSC-RECORDS/REPORTING

3. AT&T hereby amends the previously filed objection to BellSouth's Interrogatory No. 6 to correct its inadvertent reference to state commission arbitrations outside the BellSouth region. To require AT&T to comply with BellSouth's Interrogatory No. 6 as it pertains to states outside BellSouth's region would be unduly burdensome to AT&T and would require AT&T to research public records that are equally available to BellSouth. AT&T has served its Response to BellSouth's Interrogatory No. 6 on this date and identified therein all states within BellSouth's region wherein AT&T has arbitrated any issue relating to Phase I of this docket, the specific issue on which arbitration was sought, and the state commission before which AT&T sought arbitration, including the case name, docket number and date the petition was filed.

Respectfully submitted this 26<sup>th</sup> day of February, 2001.

Respectfully submitted,



---

Kenneth A. Hoffman, Esq.  
Martin P. McDonnell, Esq.  
Rutledge, Ecenia, Purnell & Hoffman, P.A.  
P. O. Box 551  
Tallahassee, FL 32302  
(850) 681-6788 (Telephone)  
(850) 681-6515 (Telecopier)

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 26<sup>th</sup> day of February, 2001:

Felicia Banks, Esq.  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Room 370  
Tallahassee, Florida 32399-0850

Elizabeth Howland  
Allegiance Telecom, Inc.  
1950 Stemmons Freeway, Suite 3026  
Dallas, TX 75207-3118

Morton Posner, Esq.  
Regulatory Counsel  
Allegiance Telecom, Inc.  
1150 Connecticut Avenue, N.W.  
Suite 205  
Washington, DC 20036

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

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

Michael A. Gross, Esq.  
Florida Cable Telecommunications, Asso.  
246 East 6<sup>th</sup> Avenue  
Tallahassee, FL 32303

Mr. Paul Rebey  
Focal Communications Corporation of Florida  
200 North LaSalle Street, Suite 1100  
Chicago, IL 60601-1914

Global NAPS, Inc.  
10 Merrymount Road  
Quincy, MA 02169

Scott Sapperstein  
Intermedia Communications, Inc.  
3625 Queen Palm Drive  
Tampa, Florida 33619-1309

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

Laura L. Gallagher, Esq.  
MediaOne Florida Telecommunications, Inc.  
101 E. College Avenue, Suite 302  
Tallahassee, FL 32301

Norman Horton, Jr., Esq.  
Messer Law Firm  
215 S. Monroe Street, Suite 701  
Tallahassee, FL 32301-1876

Jon Moyle, Esq.  
Cathy Sellers, Esq.  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301

Herb Bornack  
Orlando Telephone Company  
4558 SW 35<sup>th</sup> Street, Suite 100  
Orlando, FL 32811-6541

Peter Dunbar, Esq.  
Karen Camechis, Esq.  
P. O. Box 10095  
Tallahassee, FL 32302-2095

Charles R. Rehwinkel, Esq.  
Susan Masterton, Esq.  
Sprint-Florida, Incorporated  
Post Office Box 2214  
MS: FLTLHO0107  
Tallahassee, FL 32316

Mark Buechele  
Supra Telecom  
1311 Executive Center Drive, Suite 200  
Tallahassee, Florida 32301

Kimberly Caswell, Esq.  
Verizon Select Services, Inc.  
P. O. Box 110, FLTC0007  
Tampa, Florida 33601-0110

Charlie Pellegini, Esq.  
Patrick K. Wiggins, Esq.  
P. O. Drawer 1657  
Tallahassee, Florida 32302

Robert Scheffel Wright, Esq.  
John T. LaVia, III, Esq.  
P. O. Box 271  
Tallahassee, FL 32302

Wanda G. Montano, Esq.  
US LEC Corporation  
Morrocroft III  
6801 Morrison Boulevard  
Charlotte, NC 28211

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

Joseph A. McGlothlin, Esq.  
Vicki Gordon Kaufman, Esq.  
117 South Gadsen Street  
Tallahassee, FL 32301

Michael R. Romano, Esq.  
Level 3 Communications, LLC  
1025 Eldorado Boulevard  
Broomfield, Colorado 80021

Marsha Rule, Esq.  
AT&T  
101 North Monroe Street, Suite 700  
Tallahassee, FL 32301-1549

By: Martin P. McDonnell  
MARTIN P. MCDONNELL, ESQ.

AT&T/att2.objections