

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for Emergency Relief of Supra)
Telecommunications and Information) Docket No. 980800-TP
Systems, Inc., Against BellSouth)
Telecommunications, Inc.) Filed: August 21, 1998

SUPRA TELECOMMUNICATIONS AND INFORMATION
SYSTEMS, INC.'S NOTICE OF SERVICE OF ITS FIRST SET
OF INTERROGATORIES AND ITS FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS
TO BELL SOUTH TELECOMMUNICATIONS, INC.

Supra Telecommunications and Information Systems, Inc.
("Supra"), by and through its undersigned counsel, hereby gives
notice of service of the original and one copy of the attached
First Set of Interrogatories Nos. 1 through 26 and the original
and one copy of the attached First Request for Production of
Documents Nos. 1 through 22 to BellSouth Telecommunications, Inc.
("BellSouth") by hand delivery to Ms. Nancy H. Sims, BellSouth
Telecommunications, Inc., 150 South Monroe Street, Suite 400,
Tallahassee, Florida 32301, on August 4, 1998.

Respectfully submitted, this 21st day of August, 1998.

Suzanne Fannon Summerlin, Esq.
SUPRA TELECOMMUNICATIONS AND
INFORMATION SYSTEMS, INC.
1311-B Paul Russell Road, Suite 201
Tallahassee, Florida 32301
(850) 656-2288
Florida Bar No. 398586

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09065 AUG 21 98

#1-50-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Service has been furnished by U.S. Mail to the following individuals this 21st day of August, 1998:

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

Beth Keating, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
P. O. Box 551
Tallahassee, Florida 32302-0551


Suzanne Fannon Summerlin, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Emergency Relief of Supra) Docket No. 980800-TP
Telecommunications and Information)
Systems, Inc., Against BellSouth)
Telecommunications, Inc.)
_____) Filed August 4, 1998

Supra Telecommunications and Information Systems, Inc.'s
First Set of Interrogatories to
BellSouth Telecommunications, Inc.

COMES NOW Supra Telecommunications and Information Systems, Inc. ("Supra"), by and through its undersigned attorney, and hereby propounds the following interrogatories to BellSouth Telecommunications, Inc. ("BellSouth") 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 BellSouth who will be responsible for each answer or part thereof.

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) "Supra" means the entities to which these interrogatories are addressed, their 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 information 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) "Identify" or "identifying" or "identification" when used in reference to a natural person means to state:

- a) the full legal name of the person;
 - b) the name, title, and employer of the person at the time in question;
 - c) the present or last known employer of such person;
 - d) the present or last known business address of the person;
- and
- e) the present or last known home address.

4) "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
 - b) the business or last known address of the person; and
 - c) the present or last known telephone number of the person.
- 5) "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:
- a) the type of document (e.g. letter, memorandum, etc.);
 - b) the date of the document;
 - c) the title or label of the document;
 - d) the bates number or other identifier used to number the document for use in litigation;
 - e) the identity of the originator;
 - f) the identity of each person to whom it was sent;
 - g) the identity of each person to whom a copy or copies were sent; and
 - h) a summary of the contents of the document.

INTERROGATORIES

1. Identify the location of every BellSouth central office in the State of Florida.
2. Identify the total space (in square footage) for each BellSouth central office identified in Interrogatory no. 1.

3. Identify the amount of space (in square footage) currently occupied by BellSouth's equipment in each BellSouth central office identified in Interrogatory no. 1.

4. Identify the amount of space (in square footage) currently unavailable for physical collocation or virtual collocation by ALECs in each BellSouth central office identified in Interrogatory no. 1.

5. Identify any space (in square footage) currently assigned for BellSouth's use for each BellSouth central office identified in Interrogatory no. 1.

6. Identify all Alternative Local Exchange Carriers ("ALECs") with which BellSouth has entered into virtual collocation agreements since February 6, 1996.

7. Identify all ALECs with which BellSouth has entered into physical collocation agreements since February 6, 1996.

8. Describe in detail, what problems and/or complications BellSouth has or is currently experiencing with the implementation of virtual collocation agreements identified in Interrogatory no. 6.

9. Describe in detail what problems and/or complications BellSouth has or is currently experiencing with the implementation of physical collocation agreements identified in Interrogatory no. 7.

10. Describe in detail what internal policies BellSouth has implemented regarding virtual collocation.

11. Describe in detail what internal policies BellSouth has implemented regarding physical collocation.

12. Describe in detail, step by step, the process(es) currently utilized by BellSouth when a request for virtual collocation is received.

13. Describe in detail, step by step, the process(es) currently utilized by BellSouth when a request for physical collocation is received.

14. Describe in detail, step by step, the method utilized by BellSouth for its own internal requests for the installation of any equipment in its central offices described in Interrogatory no. 1.

15. Identify the time (from initiation to completion) it takes BellSouth to install its own equipment.

16. Identify the time (from initiation to completion) it takes BellSouth to install equipment for an ALEC.

17. Identify the time (from initiation to completion) BellSouth proposes it will take to install equipment for Supra.

18. Describe in detail, the basis for BellSouth's \$3,850.00 application fee charged for physical collocation.

19. Describe how BellSouth's evaluation of an application for physical collocation differs from an inventory validation.

20. Identify the individual expert(s) at BellSouth who is/are responsible for assuring that ALECs receive professional, knowledgeable, and timely responses to inquiries regarding requests for collocation space at any BellSouth central office.

21. Identify the individual(s) at BellSouth who is/are responsible for assuring that ALECs receive quality service when requesting collocation space at any BellSouth central office.

22. Identify the individual(s) at BellSouth who is/are responsible for policy statements regarding collocation space at any BellSouth central office.

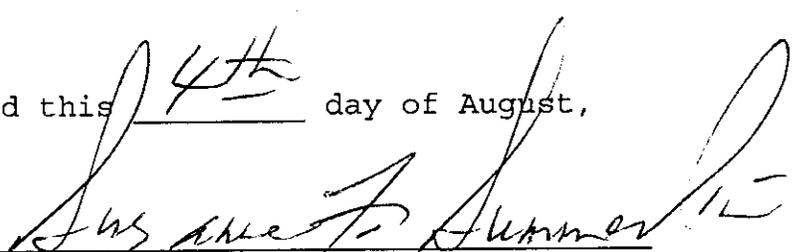
23. Identify the individual(s) at BellSouth who is/are responsible for assuring that BellSouth complies with the requirements of the Telecommunications Act (TA) and the Code of Federal Regulations (CFR) as they relate to virtual collocation.

24. Identify the individual(s) at BellSouth who is/are responsible for assuring that BellSouth complies with the requirements of the Telecommunications Act (TA) and the Code of Federal Regulations (CFR) as they relate to physical collocation.

25. Identify the individual(s) at BellSouth who is/are responsible for the negotiation and implementation of collocation agreements with ALECs.

26. Describe in detail BellSouth's understanding regarding the type of equipment ALECs are allowed to install in collocation cages in its central offices in compliance with the TA and CFR and the legal basis for BellSouth's understanding.

Respectfully submitted this 4th day of August,
1998.



SUZANNE FANNON SUMMERLIN
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(850) 656-2288
Florida Bar No. 398586

Attorney for Supra
Telecommunications & Information
Services, Inc.

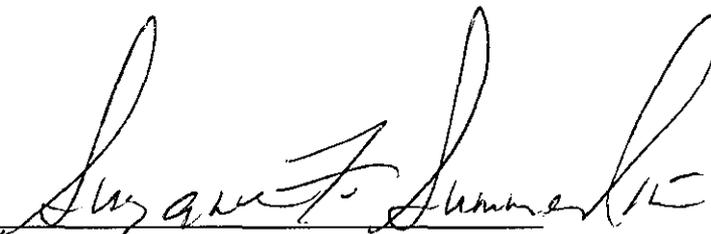
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Emergency Relief of) Docket No. 980800-TP
Supra Telecommunications and Information)
Systems, Inc., Against BellSouth)
Telecommunications, Inc.)
_____)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of Supra Telecommunications & Information Systems, Inc.'s First Set of Interrogatories to BellSouth Telecommunications, Inc. have been served by hand delivery to Ms. Nancy Sims, BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400, Tallahassee, Florida 323201 and that a true and correct copy thereof has been furnished by U.S. Mail, this 4th day of August, 1998 to the following:

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, Florida 32302-0551



Suzanne Fannon Summerlin
1311-B Paul Russell Road
Suite 201
Tallahassee, Florida 32301
(850) 656-2288
Florida Bar No. 398586

Attorney for Supra
Telecommunications & Information
Systems, Inc.

copy of such writing or record where the original is not in the possession, custody or control of BellSouth.

3. If BellSouth has possession, custody, or control of the originals of the documents requested, please produce the original or a complete copy of the original and all copies which are different in any way from the original, whether by interlineation, receipt stamp or notation. If BellSouth does not have possession, custody, or control of the originals of the documents requested, please produce any copies in the possession, custody, or control, however made, of BellSouth.

4. Any objection, whether in whole or in part, to production of the requested documents that claims confidentiality of any document should, under the applicable rules, be accompanied by a motion for protective order. If you wish to utilize a protective agreement regarding such documents, please notify Supra at least ten (10) days prior to the discovery due date, of your desire to resolve informally the objection based upon a claim of confidentiality.

5. "BellSouth" means the entities to which this Request is addressed, their 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 control, custody, knowledge, or possession or, or responsibility for, any documents called for by this Request.

6. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to bring within the scope of this Request any documents that might otherwise be construed to be outside the scope of any particular request.

7. No documents created prior to January 1, 1995, need be provided in response to these Requests.

DOCUMENTS REQUESTED

1. Provide copies of all documents which BellSouth relied upon in responding to Supra's First Set of Interrogatories.
2. Provide documents which detail each BellSouth central office in Florida.
3. Provide any and all blueprints of each BellSouth central office in Florida.
4. Provide any and all charts of space utilization in each of BellSouth's central offices in Florida.
5. Provide photographs of any kind of each BellSouth central office in Florida.
6. Provide copies of any and all internal or external studies of any kind, which relate to the issues in these proceedings and which were performed by or on behalf of BellSouth concerning each central office in Florida.
7. Identify the name, last known address, and telephone number for each individual(s) or entity(s) related to Request No. 6.
8. Provide BellSouth's plans for equipment build out for the next three years for each BellSouth central office in Florida including the types of equipment, the purpose of equipment deployment, and the central office space reduction as a result of such deployment.
9. Provide documents related to any planned expansion for each BellSouth central office in Florida.
10. Provide details of all space used in each BellSouth central office in Florida for purposes other than equipment installation.
11. Provide copies of all blueprints and business plans related to BellSouth's switch replacement plan.
12. Provide copies of all blueprints and business plans related to BellSouth's switch changeover plans.
13. Provide details on BellSouth's inventory of all conduits and riser space in each BellSouth central office in Florida.

14. Provide the details of all virtual collocation arrangements in the State of Florida that BellSouth has entered into since February 6, 1996.

15. Provide the details of all physical collocation arrangements in the State of Florida that BellSouth has entered into since February 6, 1996.

16. Provide a description of the equipment that has been collocated under the arrangements listed in response to Request Nos. 14 and 15.

17. Provide the minutes of all meetings of the interconnection department and management at BellSouth regarding BellSouth's policies and activities in regard to requests for virtual or physical collocation by ALECs.

18. Provide all documents related to BellSouth internal measurements for BellSouth's own equipment installation and for ALECs' collocation.

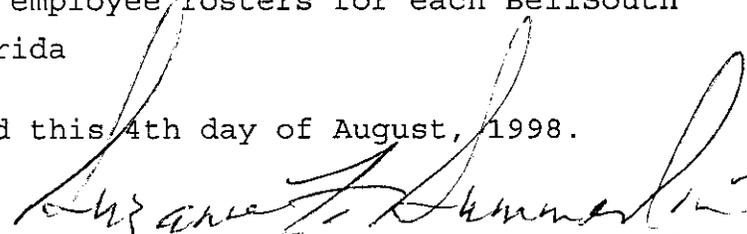
19. Produce all documents that demonstrate that the time intervals for provision of collocation space, from start to finish, provided by BellSouth for Supra are at parity with those BellSouth provides for itself and its subsidiaries.

20. Provide BellSouth's TSLRIC and the supporting documentation.

21. Provide all current work orders for each BellSouth central office in Florida.

22. Provide the employee rosters for each BellSouth central office in Florida

Respectfully submitted this 4th day of August, 1998.



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Attorney for Supra Telecommunications
& Information Systems, Inc.

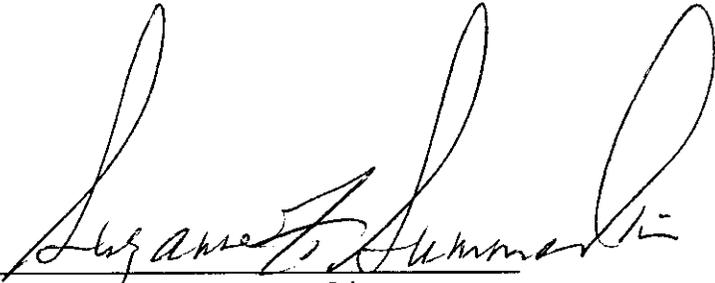
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