

J. Phillip Carver  
Senior Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0710

ORIGINAL

January 21, 2003

RECEIVED FPSC  
COMMISSION  
CLERK  
CO JAN 21 PM 4:15

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

**Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)**

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. filed its Responses and Objections to AT&T's Second Interrogatories, dated December 31, 2002.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*J. Phillip Carver*

J. Phillip Carver (JPC)

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC \_\_\_\_\_  
OTH \_\_\_\_\_

RECEIVED & FILED

*L.V.N.*

DOCUMENT NUMBER-DATE

FPSC-BUREAU OF RECORDS

00832 JAN 21 03

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 981834-TP and 990321-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

(\*) Hand Delivery and First Class U. S. Mail this 21st day of January, 2003 to the following:

Beth Keating, Staff Counsel (\*)  
C. Lee Fordham, Staff Counsel (\*)  
Wayne Knight, Staff Counsel (\*)  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6212  
Fax. No. (850) 413-6250  
[bkeating@psc.state.fl.us](mailto:bkeating@psc.state.fl.us)  
[cfordham@psc.state.fl.us](mailto:cfordham@psc.state.fl.us)  
[wknight@psc.state.fl.us](mailto:wknight@psc.state.fl.us)

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman, Arnold,  
& Steen, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Attys. for FCCA  
Atty. for Network Telephone Corp.  
Atty. for BlueStar  
[jmclglothlin@mac-law.com](mailto:jmclglothlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

Richard D. Melson  
Hopping Green Sams & Smith, P.A.  
Post Office 6526  
123 South Calhoun Street  
Tallahassee, FL 32314  
Tel. No. (850) 222-7500  
Fax. No. (850) 224-8551  
Atty. For MCI & ACI  
[rmelson@hgss.com](mailto:rmelson@hgss.com)

Terry Monroe  
Vice President, State Affairs  
Competitive Telecomm. Assoc.  
1900 M Street, N.W.  
Suite 800  
Washington, D.C. 20036  
Tel. No. (202) 296-6650  
Fax. No. (202) 296-7585  
[tmonroe@comptel.org](mailto:tmonroe@comptel.org)

Marilyn H. Ash  
MGC Communications, Inc.  
3301 North Buffalo Drive  
Las Vegas, Nevada 89129  
Tel. No. (702) 310-8461  
Fax. No. (702) 310-5689  
[mash@mgcicorp.com](mailto:mash@mgcicorp.com)

Patrick Wiggins  
Charles J. Pellegrini  
Katz, Kutter Law Firm  
106 E. College Avenue  
12<sup>th</sup> Floor  
Tallahassee, FL 32301  
Tel. No. (850) 224-9634  
Fax. No. (850) 222-0103  
Attys. for Intermedia  
[pkwiggins@katzlaw.com](mailto:pkwiggins@katzlaw.com)

Kimberly Caswell  
Verizon  
One Tampa City Center  
201 North Franklin Street (33602)  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601-0110  
Tel. No. (813) 483-2606  
Fax. No. (813) 204-8870  
[kimberly.caswell@verizon.com](mailto:kimberly.caswell@verizon.com)

Peter M. Dunbar, Esq.  
Barbara D. Auger, Esq.  
Pennington, Moore, Wilkinson &  
Dunbar, P.A.  
Post Office Box 10095  
Tallahassee, Florida 32302  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126  
[pete@penningtonlawfirm.com](mailto:pete@penningtonlawfirm.com)  
[Barbara@penningtonlawfirm.com](mailto:Barbara@penningtonlawfirm.com)

Carolyn Marek  
Vice President of Regulatory Affairs  
Southeast Region  
Time Warner Communications  
233 Bramerton Court  
Franklin, Tennessee 37069  
Tel. No. (615) 376-6404  
Fax. No. (615) 376-6405  
Represented by Pennington Law Firm  
[Carolyn.Marek@twtelecom.com](mailto:Carolyn.Marek@twtelecom.com)

Mark Buechele  
Supra Telecommunications &  
Information Systems, Inc.  
2620 S.W. 27th Avenue  
Miami, FL 33133  
Tel. No. (305) 531-5286  
Fax. No. (305) 476-4282  
[buechele@stis.net](mailto:buechele@stis.net)

Donna Canzano McNulty, Esq.  
MCI WorldCom  
1203 Governors Square Boulevard  
Suite 201  
Tallahassee, FL 32301  
Tel. No. (850) 219-1008  
Fax. No. (850) 219-1018  
[Donna.mcnulty@wcom.com](mailto:Donna.mcnulty@wcom.com)

Michael A. Gross  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

TCG South Florida  
c/o Rutledge Law Firm  
Kenneth Hoffman  
P.O. Box 551  
Tallahassee, FL 32302-0551  
Tel. No. (850) 681-6788  
Fax. No. (850) 681-6515  
[ken@reuphlaw.com](mailto:ken@reuphlaw.com)

Time Warner AxS of FL, L.P.  
2301 Lucien Way  
Suite 300  
Maitland, FL 32751  
Represented by Pennington Law Firm

Laura L. Gallagher  
Laura L. Gallagher, P.A.  
101 E. College Avenue  
Suite 302  
Tallahassee, FL 32301  
Tel. No. (850) 224-2211  
Fax. No. (850) 561-3611  
Represents MediaOne

Susan S. Masterton  
Charles J. Rehwinkel  
Sprint Comm. Co. LLP  
P.O. Box 2214  
MC: FLTLHO0107  
Tallahassee, FL 32316-2214  
Tel. No. (850) 847-0244  
Fax. No. (850) 878-0777  
[Susan.masterton@mail.sprint.com](mailto:Susan.masterton@mail.sprint.com)

Sprint-Florida, Incorporated  
Mr. F. B. (Ben) Poag  
P.O. Box 2214 (MC FLTLHO0107)  
Tallahassee, FL 32316-2214  
Tel: 850-599-1027  
Fax: 407-814-5700  
[Ben.Poag@mail.sprint.com](mailto:Ben.Poag@mail.sprint.com)

William H. Weber, Senior Counsel  
Gene Watkins  
Covad Communications  
1230 Peachtree Street, N.E.  
19th Floor  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3494  
Fax. No. (404) 942-3495  
[wweber@covad.com](mailto:wweber@covad.com)  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

Bettye Willis  
ALLTEL Comm. Svcs. Inc.  
One Allied Drive  
Little Rock, AR 72203-2177  
[bettye.j.willis@alltel.com](mailto:bettye.j.willis@alltel.com)

J. Jeffry Wahlen  
Ausley & McMullen  
P.O. Box 391  
Tallahassee, FL 32302  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)

Development Specialists, Inc.  
Norton Cutler  
c/o Steve Victor  
70 West Madison Street  
Suite 2300  
Chicago, IL 60602-4250  
Tel. No. (312) 263-4141  
Fax. No. (312) 263-1180

Rodney L. Joyce  
Shook, Hardy & Bacon, L.L.P.  
600 14th Street, N.W.  
Suite 800  
Washington, D.C. 20005-2004  
Tel. No. (202) 639-5602  
Fax. No. (202) 783-4211  
Counsel for Network Access Solutions  
[rjoyce@shb.com](mailto:rjoyce@shb.com)

Brent McMahan, Vice President  
Regulatory and Governmental Affairs  
Network Telephone Corporation  
815 South Palafox Street  
Pensacola, FL 32501  
Tel. No. (850) 432-4855  
Fax. No. (850) 437-0724

Network Access Solutions Corp.  
Mr. Don Sussman  
Three Dulles Tech Center  
13650 Dulles Technology Drive  
Herndon, VA 20171-4602  
Tel. No. : (703) 793-5102  
Fax. No. (208) 445-7278  
[dsussman@nas-corp.com](mailto:dsussman@nas-corp.com)

Verizon Florida, Inc.  
Ms. Michelle A. Robinson  
%Mr. David Christian  
106 East College Avenue  
Suite 810  
Tallahassee, FL 32301-7704  
Tel. No. (813) 483-2526  
Fax. No. (813) 223-4888  
[Michelle.Robinson@verizon.com](mailto:Michelle.Robinson@verizon.com)

Ms. Lisa A. Riley  
1200 Peachtree Street, N.E.  
Suite 8066  
Atlanta, GA 30309-3523  
Tel. No. (404) 810-7812  
Fax. No. (404) 877-7646  
[lriley@att.com](mailto:lriley@att.com)

Florida Digital Network, Inc.  
Matthew Feil, Esq.  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801  
Tel. No. (407) 835-0460  
Fax. No. (407) 835-0309  
[mfeil@floridadigital.net](mailto:mfeil@floridadigital.net)

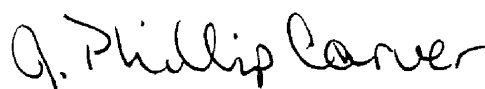
FPTA, Inc.  
Mr. David Tobin  
Tobin & Reyes  
7251 West Palmetto Park Road  
#205  
Boca Raton, FL 33433-3487  
Tel. No. (561) 620-0656  
Fax. No. (561) 620-0657  
[dst@tobinreyes.com](mailto:dst@tobinreyes.com)

John McLaughlin  
KMC Telecom. Inc.  
Mr. John D. McLaughlin, Jr.  
1755 North Brown Road  
Lawrenceville, GA 30043  
Tel. No. (678) 985-6261  
Fax. No. (678) 985-6213  
[jmclau@kmctelecom.com](mailto:jmclau@kmctelecom.com)

Ms. Nanette S. Edwards  
4092 South Memorial Parkway  
Huntsville, AL 35802-4343  
Tel. No. (256) 382-3856  
Fax. No. (256) 382-3936  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

Telecomm. Resellers Assoc.  
Andrew Isar  
7901 Skansie Avenue  
Suite 240  
Gig Harbor, WA 98335  
Tel. No. (253) 851-6700  
Fax. No. (253) 851-6474

Tracy W. Hatch, Esq. (\*)  
Floyd R. Self, Esq. (\*)  
Messer, Caparello & Self, P.A.  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Represents AT&T  
[fself@lawfla.com](mailto:fself@lawfla.com)  
[thatch@lawfla.com](mailto:thatch@lawfla.com)

  
\_\_\_\_\_  
J. Phillip Carver (UA)