

ORIGINAL

RECEIVED-FPSC

Legal Department

E. EARL EDENFIELD, JR.  
General Attorney

00 JUN 22 PM 4:33

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0763

RECORDS AND  
REPORTING

June 22, 2000

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. 990649-TP (UNEs)

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. served its First Request for Production of Documents and First Interrogatories to Florida Digital Network, Incorporated.

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,

*E. Earl Edenfield Jr.*

E. Earl Edenfield, Jr. (Handwritten initials)

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- LEG \_\_\_\_\_
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- RGO \_\_\_\_\_
- SEC   I
- SER \_\_\_\_\_
- OTH \_\_\_\_\_

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

RECEIVED & FILED

*[Signature]*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07633 JUN 22 8

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE  
Docket No. 990649-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
Federal Express this 22nd day of June, 2000 to the following:

Wayne D. Knight  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6216  
Fax. No. (850) 413-6217

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 BlueStar

Marsha Rule (+)  
AT&T Communications  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6364  
Fax. No. (850) 425-6343

Jim Lamoureux (+)  
AT&T Communications  
1200 Peachtree Street, N.E.  
Room 8068  
Atlanta, Georgia 30309  
Tel. No. (404) 810-4196  
Fax. No. (404) 877-7648

Richard D. Melson (+)  
Gabriel E. Nieto  
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  
Atty. for Rhythms Link  
Atty. for ACI

Dulaney L. O'Roark  
MCI Telecommunications Corporation  
6 Concourse Parkway  
Suite 600  
Atlanta, GA 30328  
Tel. No. (770) 284-5498  
Fax. No. (770) 284-5488

Floyd Self  
Norman H. Horton, Jr.  
Messer, Caparello & Self  
Post Office Drawer 1876  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Attys. for WorldCom  
Atty. for NorthPoint

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

Susan Huther  
Rick Heapter  
MGC Communications, Inc.  
3301 Worth Buffalo Drive  
Las Vegas, Nevada 89129  
Tel. No. (702) 310-4272  
Fax. No. (702) 310-5689

John Kerkorian (+)  
MGC Communications  
d/b/a Mpower Communications Corp.  
Regional Vice President  
Legal & Regulatory Affairs  
Southeast Region  
5607 Glenridge Drive, Suite 310  
Atlanta, GA 30342  
Tel. No. (404) 554-1000  
Fax. No. (404) 554-0010

Jeremy Marcus (+)  
Kristin Smith  
Blumenfeld & Cohen  
1625 Massachusetts Ave., Ste. 300  
Washington, D.C. 20036  
Tel. No. (202) 955-6300  
Fax. No. (202) 955-6460

Kimberly Caswell (+)  
GTE Florida Incorporated  
One Tampa City Center  
201 North Franklin Street  
Tampa, Florida 33602  
Tel. No. (813) 483-2617  
Fax. No. (813) 204-8870

Karen M. Camechis (+)  
Pennington, Moore, Wilkinson &  
Dunbar, P.A.  
215 South Monroe Street, 2nd Flr.  
Tallahassee, Florida 32301  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126

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

Mark E. Buechele, Esquire  
Supra Telecom  
1311 Executive Center Drive  
Koger Center - Ellis Building  
Suite 200  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522

**Donna Canzano McNulty, Esq. (+)**  
MCI WorldCom, Inc.  
325 John Knox Road  
The Atrium Bldg., Suite 105  
Tallahassee, FL 32303  
Tel. No. (850) 422-1254  
Fax. No. (850) 422-2586

**Michael A. Gross (+)**  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
310 North Monroe Street  
Tallahassee, FL 32301  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676

**ACI Corp.**  
7337 S. Revere Parkway  
Englewood, CO 80112  
Tel. No. (303) 476-4200  
Fax. No. (303) 476-4201

**Florida Public Telecomm. Assoc.**  
Angela Green, General Counsel  
125 South Gadsden Street  
#200  
Tallahassee, FL 32301-1525  
Tel. No. (850) 222-5050  
Fax. No. (850) 222-1355

**Intermedia Communications, Inc.**  
Scott Sapperstein (+)  
Sr. Policy Counsel  
3625 Queen Palm Drive  
Tampa, FL 33619-1309  
Tel. No. (813) 829-4093  
Fax. No. (813) 829-4923

**TCG South Florida**  
c/o Rutledge Law Firm  
Kenneth Hoffman  
215 South Monroe Street, Ste. 420  
Tallahassee, FL 32301

Tel. No. (850) 681-6788  
Fax. No. (850) 681-6515  
Time Warner AxS of FL, L.P.  
2301 Lucien Way  
Suite 300  
Maitland, FL 32751  
Represented by Pennington Law Firm

**Glenn Harris, Esq.**  
NorthPoint Communications, Inc.  
222 Sutter Street  
7th Floor  
San Francisco, CA 94108  
Tel. No. (415) 365-6095  
Fax. No. (415) 403-4004  
Email Fax. (503) 961-1314

**Charles J. Rehwinkel (+)**  
1313 Blair Stone Road  
Tallahassee, FL 32301  
Tel. No. (850) 847-0244  
Fax. No. (850) 878-0777  
Counsel for Sprint

**John P. Fons (+)**  
Ausley & McMullen  
Washington Square Building  
227 South Calhoun Street  
Tallahassee, FL 32301  
Tel. No. (850) 224-9115  
Fax. No. (850) 222-7560  
Counsel for Sprint

**Brian Sulmonetti**  
MCI WorldCom, Inc.  
6 Concourse Parkway  
Suite 3200  
Atlanta, GA 30328  
Tel. No. (770) 284-5500

**Catherine F. Boone, Esq. (+)**  
Regional Counsel  
Covad Communications Company  
10 Glenlake Parkway  
Suite 650  
Atlanta, GA 30328-3495  
Tel. No. (678) 579-8388  
Fax. No. (678) 320-9433

**Charles J. Beck**  
Deputy Public Counsel  
Office of the Public Counsel  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400  
Tel. No. (850) 488-9330  
Fax. No. (850) 488-4491

**Eric J. Branfman (+)**  
**Morton J. Posner (+)**  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007-5116  
Tel. No. (202) 424-7500  
Fax. No. (202) 424-7645  
Represents Florida Digital Network, Inc.  
Represents KMC, KMC II & KMC III

**John McLaughlin**  
KMC Telecom. Inc.  
Suite 170  
3025 Breckinridge Boulevard  
Duluth, GA 30096  
Tel. No. (770) 931-5260  
Fax. No. (770) 638-6796

**Betty Willis (+)**  
ALLTEL Communications  
Services, Inc.  
One Allied Drive  
Little Rock, AR 72203-2177

**J. Jeffry Wahlen (+)**  
Ausley & McMullen  
227 South Calhoun Street  
Tallahassee, FL 32301  
Tel. No. (850) 425-5471  
Fax. No. (850) 222-7560  
Atty. for ALLTEL

**Stephen P. Bowen**  
Blumenfeld & Cohen  
4 Embarcadero Center  
Suite 1170  
San Francisco, CA 94111  
Tel. No. (415) 394-7500  
Fax. No. (415) 394-7505

**Norton Cutler (+)**  
General Counsel  
BlueStar Networks, Inc.  
401 Church Street  
24th Floor  
Nashville, Tennessee 37201  
Tel. No. (615) 346-3848  
Fax. No. (615) 255-2102

**Michael Bressman (+)**  
Associate General Counsel  
401 Church Street  
24th Floor  
Nashville, Tennessee 37201  
Tel. No. (615) 346-6660  
Fax. No. (615) 255-2102

**Patrick K. Wiggins**  
Wiggins & Villacorta, P.A.  
2145 Delta Boulevard, Suite 200  
Tallahassee, FL 32303

**George S. Ford (+)**  
Chief Economist  
Z-Tel Communications, Inc.  
601 South Harbour Island Blvd.  
Tampa, FL 33602  
Tel. No. (813) 233-4630  
Fax. No. (813) 233-4620  
gford@z-tel.com

**Jonathan E. Canis**  
**Michael B. Hazzard**  
Kelley Drye & Warren, LLP  
1200 19th Street, NW, Fifth Floor  
Washington, DC 20036  
Tel. No. (202) 955-9600  
Fax. No. (202) 955-9792  
jacanis@kelleydrye.com  
mhazzard@kelleydrye.com  
Counsel for Z-Tel Communications, Inc.

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

**Jon C. Moyle, Jr., Esq.**  
**Cathy M. Sellers, Esq.**  
Moyle, Flanigan, Katz, Kolins,  
Raymond & Sheehan, P.A.  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 681-3828  
Fax. No. (850) 681-8788  
Attys. for Global NAPs  
jmoylejr@moylelaw.com  
csellers@moylelaw.com

**Russell M. Blau**  
**Marc B. Rothschild (+)**  
**Robert Ridings**  
Swidler Berlin Shereff Friedman  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007-5116  
Tel. No. (202) 424-7755  
Fax. No. (202) 424-7643  
Attys. for Broadslate Networks, Inc.  
Attys. for @link Network, Inc.  
Attys. for Network Telephone  
Attys. for Cleartel Comm.

**John Spilman**  
Director Regulatory Affairs and  
Industry Relations  
Broadslate Networks, Inc.  
675 Peter Jefferson Parkway  
Suite 310  
Charlottesville, VA 22911  
Tel. No. (804) 220-7606  
Fax. No. (804) 220-7701

**Constance L. Kirkendall**  
Regulatory Manager  
@link Network, Inc.  
2220 Campbell Creek Blvd.  
Suite 110  
Richardson, TX 75082-4420  
Tel. No. (972) 367-1700  
Fax. No. (972) 367-1775

**Gary Cohen (+)**  
Blumfeld & Cohen  
1625 Massachusetts Ave., N.W.  
Suite 320  
Washington, D.C. 20036  
Represents Rhythms Links, Inc.

Hope G. Colantonio  
Legal & Regulatory Manager  
ClearTel Communications, Inc.  
1255 22nd Street N.W., 6th Floor  
Washington, D.C. 20037  
Tel. No. (202) 715-1300

  
Bennett L. Ross (A.W.)

**(+) Signed Protective Agreement**