

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing )  
of unbundled network elements )  
\_\_\_\_\_ )

Docket No. 9900-TH  
Filed: July 7, 2000

RECEIVED-FPSC  
00 JUL 10 AM 9:00  
RECORDS AND REPORTING

RHYTHMS LINKS INC.'S NOTICE OF SERVICE  
OF RESPONSES AND OBJECTIONS TO BELL SOUTH'S  
FIRST SET OF INTERROGATORIES  
AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Rhythms Links Inc. hereby gives notice of service of its Responses and Objections to BellSouth's First Set of Interrogatories and First Request for Production of Documents.

RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of July, 2000.

HOPPING GREEN SAMS & SMITH, P.A.

By: Richard D. Melson

Richard D. Melson  
P.O. Box 6526  
Tallahassee, FL 32314  
(850) 425-2313

ATTORNEY FOR RHYTHMS LINKS INC.

APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
EGR \_\_\_\_\_  
LEG \_\_\_\_\_  
OPC \_\_\_\_\_  
PAI \_\_\_\_\_  
RGO \_\_\_\_\_  
SEC     
SER \_\_\_\_\_  
OTH \_\_\_\_\_

RECEIVED & FILED

Mel  
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

08263 JUL 10 8

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail, hand delivery(\*), or Federal Express(\*\*) this 7th day of July, 2000.

\*Beth Keating  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

\*BellSouth Telecommunications,  
Inc.  
Nancy B. White  
c/o Nancy H. Sims  
150 S. Monroe Street,  
Suite 400  
Tallahassee, FL 32301-1556

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman,  
Arnold, & Steen, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301

Andrew O. Isar  
Telecommunications Resellers  
Association  
4312 92<sup>nd</sup> Avenue, N.W.  
Gig Harbor, WA 98335

Floyd Self/Norman Horton, Jr.  
Messer, Caparello & Self  
P.O. Drawer 1876  
215 S. Monroe Street Suite 701  
Tallahassee, FL 32302-1876

Florida Public Telecom Assoc.  
Angela Green, General Counsel  
125 S. Gadsden Street # 200  
Tallahassee, FL 32301-1525

Marsha Rule  
AT&T Communications  
101 N. Monroe Street  
Suite 700  
Tallahassee, FL 32301

Susan Hither  
Rick Heater  
M.C. Communications, Inc.  
3301 Worth Buffalo Drive  
Las Vegas, Nevada 89129

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

Jeremy Marcus  
Kristen Smith  
Blumenfeld & Cohen  
1625 Massachusetts Ave. NW  
Suite 300  
Washington, D.C. 20036

Terry Monroe  
Vice President, State Affairs  
Competitive Telecomm. Assoc.  
1900 M. Street, N.W.  
Suite 800  
Washington, DC 20036

\*\*Kimberly Caswell  
GTE Service Corporation  
One Tampa City Center  
201 North Franklin Street  
Tampa, FL 33601-0110

Carolyn Marek  
Vice President of Regulatory  
Affairs  
Southeast Region  
Time Warner Communications  
233 Bramerton Court  
Franklin, TN 37069

Mark Buechele  
Supra Telecom Koger Center  
Ellis Building, Suite 1311  
Executive Center Drive  
Tallahassee, FL 32301

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

Michael A. Gross  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
310 North Monroe Street  
Tallahassee, FL 32301

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

Karen M. Camechis  
Pennington, Moore, Wilkinson &  
Dunbar  
P.O. Box 10095  
Tallahassee, FL 32302

Scott A. Sapperstein  
Sr. Policy Counsel  
Intermedia Communications  
3625 Queen Palm Dr.  
Tampa, FL 33619

Robert Rigings  
Marc B. Rothschild  
Swidler Berlin Shereff  
Friedman, LLP  
3000 K Street, NW, Suite 300  
Washington, D.C. 20007-5116

Cathy Boone  
Covad Communications, Co.  
9600 Great Hills Trail  
Suite 150W  
Austin TX, 78759

Charles J. Rehwinkel  
Sprint  
P.O. Box 2214  
Tallahassee, FL 32316

Bettye Willis  
ALLTEL Communications  
Services, Inc.  
One Allied Drive  
Little Rock, AR 72203-2177

J. Jeffrey Wahlen  
Ausley & McMullen  
P.O. Box 391  
Tallahassee, FL 32302

Florida Digital Network, Inc.  
390 N. Orange Ave., Suite 2000  
Orlando, FL 32801

KMC Telecom, Inc.  
John McLaughlin  
Suite 170  
3025 Breckinridge Blvd.  
Duluth, Ga 30096

MCI WorldCom, Inc.  
Mr. Brian Sulmonetti  
Concourse Corporate Center Six  
Six Concourse Parkway  
Suite 3200  
Atlanta, GA 30328

NorthPoint Communications,  
Inc.  
Glenn Harris, Esq.  
22 Sutter Street, 7<sup>th</sup> Floor  
San Francisco, CA 94108

Office of Public Counsel  
Stephen C. Reilly  
c/o The Florida Legislature  
111 W. Madison Street, Rm. 812  
Tallahassee, FL 32399-1400

Holland Law Firm  
Bruce May  
P.O. Drawer 810  
Tallahassee, FL 32302

\*John Fons  
Ausley & McMullen  
P.O. Box 391  
Tallahassee, FL 32302

Norton Cutler  
General Counsel  
BlueStar Networks, Inc.  
40 Church Street  
24<sup>th</sup> Floor  
Nashville, TN 37201

George S. Ford  
Chief Economist  
Z-Tel Communications, Inc.  
601 South Harbor Island Blvd.  
Tampa, FL 33602

Jonathan E. Canis  
Michael B. Hazzard  
Kelley Dry & Warren, LLP  
1200 19<sup>th</sup> Street, NW,  
Fifth Floor  
Washington, DC 20036

Jon C. Moyle, Jr. Esq.  
Cathy M. Sellers, Esq.  
Moyle, Lanigan, Katz, Kaolins,  
Raymond & Sheeran, P.A.  
The Perkins House  
118 N. Gadsden Street  
Tallahassee, FL 32301

Rodney L. Joyce  
Shook, Hardy & Bacon, L.L.P.  
600 14<sup>th</sup> Street, N.W.  
Suite 800  
Washington, D.C. 20005-2004

Hope G. Colantonio  
Cleartel Communications, Inc.  
1255 22<sup>nd</sup> Street N.W.  
6<sup>th</sup> Floor  
Washington, DC 20037

Constance Kirkendall  
@link Networks, Inc.  
2220 Campbell Creek Blvd.  
Suite 110  
Richardson, TX 75082-4420

John Spilman  
Broadslate Networks of  
Florida, Inc.  
675 Peter Jefferson Parkway  
Suite 310  
Charlottesville, VA 22911

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

Network Access Solutions  
Corporation  
100 Carpenter Drive, Suite 206  
Sterling, VA 20164

Mark Ortlieb  
SBC Telecom, Inc.  
130 E. Travis, Rm. 5-K-03  
San Antonio, TX 78205

Sprint Communications Company  
Limited Partnership  
3100 Cumberland Circle  
Mailstop GAATLN0802  
Atlanta, GA 30339

Patrick K. Wiggins, Esq.  
Charles J. Pellegrini  
Wiggins Law Firm  
P.O. Drawer 1657  
Tallahassee, FL 32302

Brent E. McMahan  
Vice President-Regulatory and  
Government Affairs  
Network Telephone Corporation  
815 South Palafox Street  
Pensacola, FL 32501



---

Attorney