

WOMBLE  
CARLYLE  
SANDRIDGE  
& RICE

A PROFESSIONAL LIMITED  
LIABILITY COMPANY

One Atlantic Center  
1201 West Peachtree Street  
Suite 3500  
Atlanta, GA 30309  
Telephone: (404) 872-7000  
Fax: (404) 888-7490  
Web site: www.wcsr.com

ORIGINAL

Loretta A. Cecil  
Direct Dial: (404) 888-7387  
Direct Fax: (404) 870-4826  
E-mail: lcecil@wcsr.com

March 25, 2003

VIA FEDERAL EXPRESS

Mrs. Blanca S. Bayo  
Director, Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

COMMISSION  
CLERK

RECEIVED-FPSC  
MAR 25 AM 11:04

Re: Complaint of AT&T Communications of the Southern  
States, LLC, Teleport Communications Group, Inc., and  
TCG South Florida For Enforcement of Interconnection  
Agreements with BellSouth Telecommunications, Inc.  
Docket No. 020919-TP

Dear Mrs. Bayo:

Please find enclosed for filing in your office the original and two (2) copies of AT&T's Notice of Serving First Set of Interrogatories and First Set for Production of Documents on BellSouth Telecommunications, Inc. on behalf of AT&T Communications of the Southern States, LLC, Teleport Communications Group, Inc., and TCG of South Florida.

Please stamp two (2) copies of the Notice in the usual manner and return to us via our courier.

If you have any questions, please do not hesitate to contact me at 404-888-7437.

Sincerely yours,

*Loretta A. Cecil*

Loretta A. Cecil

Enclosure(s)

RECEIVED & FILED

*mar*  
FPSC-BUREAU OF RECORDS

GEORGIA / NORTH CAROLINA / SOUTH CAROLINA / VIRGINIA / WASHINGTON, D.C.

DOCUMENT NUMBER-DATE

02821 MAR 25 8

FPSC-COMMISSION CLERK

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DISTRIBUTION CENTER  
03 MAR 25 AM 08:04

**CERTIFICATE OF SERVICE**

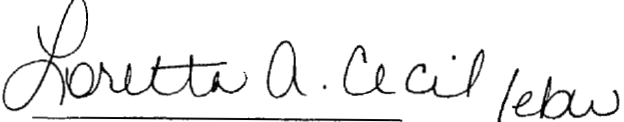
I HEREBY CERTIFY that a copy of AT&T's Notice of Serving First Set of Interrogatories and First Set for Production of Documents on BellSouth Telecommunications, Inc. on behalf of AT&T Communications of the Southern States, LLC, Teleport Telecommunications Group, Inc. and TCG South Florida (all collectively "AT&T") was furnished by U. S. Mail this 25th day of March, 2003 to the following:

BellSouth Telecommunications, Inc.  
Nancy B. White/James Meza III/Andrew Shore  
c/o Ms. Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556  
Phone: (850) 224-7798  
Fax: (850) 222-8640  
Email: [nancy.sims@bellsouth.com](mailto:nancy.sims@bellsouth.com)/ [andrew.shore@bellsouth.com](mailto:andrew.shore@bellsouth.com)

Florida Cable Telecommunications Assoc., Inc.  
Michael A. Gross  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303  
Phone: 850-681-1990  
Fax: (850) 681-9676  
Email: [mgross@fcta.com](mailto:mgross@fcta.com)

Patricia Christensen, Esq.  
Division of Legal Services, Room 370  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Fax: (850) 413-6221  
Email: [pchrister@psc.state.fl.us](mailto:pchrister@psc.state.fl.us)

David Eppsteiner, Esq.  
AT&T Communications of the Southern States LLC  
1200 Peachtree Street, NE, Suite 8100  
Atlanta, GA 30309

A handwritten signature in cursive script that reads "Loretta A. Cecil".

Loretta A. Cecil, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In Re: Request for Arbitration )  
Concerning Complaint of AT&T )  
Communications of the Southern )  
States, LLC, Teleport )  
Communications Group, Inc., and )  
TCG South Florida for )  
Enforcement of Interconnection )  
Agreements with BellSouth )  
Telecommunications, Inc. )

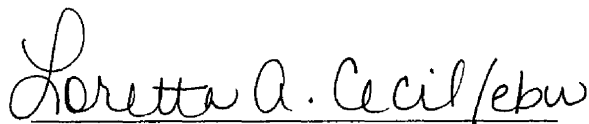
DOCKET NO. 020919-TP

FILED: March 25, 2003

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES LLC'S  
NOTICE OF SERVING ITS FIRST SET OF INTERROGATORIES  
AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS ON  
BELLSOUTH TELECOMMUNICATIONS, INC.**

AT&T Communications of the Southern States, LLC, Teleport Communications Group, Inc., and TCG South Florida (collectively "AT&T"), by and through its undersigned counsel, hereby files and serves Notice that it has served its First Set of Interrogatories and First Request for Production of Documents to BellSouth Telecommunications, Inc. by e-mail on Nancy B. White, Esq. at [nancy.white@bellsouth.com](mailto:nancy.white@bellsouth.com), James Meza, Esq. at [james.meza@bellsouth.com](mailto:james.meza@bellsouth.com), and Andrew Shore, Esq. at [andrew.shore@bellsouth.com](mailto:andrew.shore@bellsouth.com). A copy was also served by U. S. Mail to Nancy B. White, Esq., c/o Ms. Nancy H. Sims, BellSouth Telecommunications, Inc., 150 S. Monroe Street, Suite 400, Tallahassee, FL 32301 and Andrew Shore, Esq., 675 W. Peachtree Street, Suite 4300, Atlanta, GA 30375, on this the 21st day of March, 2003.

Respectfully submitted,



Loretta A. Cecil, Esq.  
FL Bar No. 358983  
Attorney for AT&T of the Southern States, LLC,  
Teleport Communications Group, Inc. and TCG  
of the Carolinas, Inc.  
Womble Carlyle Sandridge & Rice PLLC  
1201 West Peachtree Street  
Suite 3500  
Atlanta, Georgia 30309  
404-888-7437

DOCUMENT NUMBER-DATE

02821 MAR 25 8

FPSC-COMMISSION CLERK

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have served a copy of AT&T COMMUNICATIONS OF THE SOUTHERN STATES LLC'S NOTICE OF SERVING ITS FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS ON BELL SOUTH TELECOMMUNICATIONS, INC. on behalf of AT&T Communications of the Southern States, LLC, Teleport Communications Group, Inc., and TCG South Florida (collectively "AT&T") on all parties in the U.S. Mail, postage prepaid.

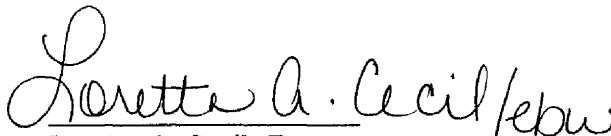
This the 25th day of March, 2003.

BellSouth Telecommunications, Inc.  
Nancy B. White/James Meza III/Andrew Shore  
c/o Ms. Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556  
Phone: (850) 224-7798  
Fax: (850) 222-8640  
Email: [nancy.sims@bellsouth.com](mailto:nancy.sims@bellsouth.com)/[andrew.shore@bellsouth.com](mailto:andrew.shore@bellsouth.com)

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Patricia Christensen, Esq.  
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David Eppsteiner, Esq.  
AT&T Communications of the Southern States LLC  
1200 Peachtree Street, NE, Suite 8100  
Atlanta, GA 30309

  
Loretta A. Cecil, Esq.