Before the FLORIDA PUBLIC SERVICE COMMISSION

Complaint and Request for Summary Disposition

BellSouth Telecommunications, Inc. Against

NewSouth Communications Corp., To Enforce

Contract Audit Provisions

Docket No. 040028-TP

Filed: April 22, 2004

NOTICE OF NEWSOUTH COMMUNICATIONS CORP. FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS

NewSouth Communications Corp. ("NewSouth") hereby gives notice that it has served its First Set of Interrogatories and First Set of Requests for Production of Documents to BellSouth Telecommunications, Inc. ("BellSouth"). Answers to the Interrogatories, which must be under oath, and documents responsive to the Requests for Production of Documents must be served on NewSouth within 20 days of BellSouth's receipt of the Interrogatories and Requests for Production of Documents, in accordance with Rule 28-106.206 of the Florida Administrative Code, and Rules 1.340 and 1.350 of the Florida Rules of Civil Procedure.

DOCUMENT NUMBER - DATE

04799 APR 22 8

Respectfully submitted,

NewSouth Communications Corp.

Moyle, Flangan, Katz, Raymond and

Jake E. Jennings Senior Vice President Regulatory Affairs & Carrier Relations NewSouth Communications Corp. NewSouth Center Two N. Main Center Greenville, SC 29601 (864) 672-5877 (864) 672-5313 (facsimile) jejennings@newsouth.com

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Dated: April 22, 2004

Its Attorneys

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of April, 2004, a true and correct copy of the

foregoing has been furnished by hand delivery* or by U.S. Mail to the following:

Lee Fordham, Esquire*
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

R. Douglas Lackey, Esquire Nancy B. White, Esquire James Meza, III, Esquire BellSouth Telecommunications, Inc. c/o Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556

Jon C. Møyle, Jr.