

**ORIGINAL**

**Matilda Sanders**

**From:** Ann Bassett [abassett@lawfla.com]  
**Sent:** Wednesday, February 08, 2006 3:25 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** Docket Nos. 050119-TP and 050125-TP  
**Attachments:** 2006-02-08, T-Mobile's NOS Discovery Responses to Staff's 1st ROG..pdf

The person responsible for this electronic filing is:

Floyd R. Self  
Messer, Caparello & Self, P.A.  
P.O. Box 1876  
Tallahassee, FL 32302-1876  
(850) 222-0720  
fself@lawfla.com

The Docket Nos. are 050119-TP - In re: Joint petition by TDS Telecom d/b/a TDS Telecom/Quincy Telephone; ALLTEL Florida, Inc.; Northeast Florida Telephone Company d/b/a NEFCOM; GTC, Inc. d/b/a GT Com; Smart City Telecommunications, LLC d/b/a Smart City Telecom; ITS Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC ["Joint Petitioners"] objecting to and requesting suspension and cancellation of proposed transit traffic service tariff filed by BellSouth Telecommunications, Inc.

and  
050125-TP - In re: Petition and complaint for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc., by AT&T Communications of the Southern States, LLC. This is being filed on behalf of (name of client)

Total Number of Pages is 5

T-Mobile USA, Inc.'s Notice of Serving Objections and Responses to FPSC Staff's First Set of Interrogatories (Nos. 1-17)

Ann Bassett  
Messer, Caparello & Self, P.A.  
Phone: 850-201-5225  
abassett@lawfla.com

CMP \_\_\_\_\_

COM \_\_\_\_\_

CTR \_\_\_\_\_

ECR \_\_\_\_\_

GCL \_\_\_\_\_

OPC \_\_\_\_\_

RCA \_\_\_\_\_

SCR \_\_\_\_\_

SGA \_\_\_\_\_

SEC   1  

OTH 2/8/2006

DOCUMENT NUMBER-DATE

01122 FEB-8 8

FPSC-COMMISSION CLERK

ORIGINAL

LAW OFFICES  
**Messer, Caparello & Self**  
A Professional Association

Post Office Box 1876  
Tallahassee, Florida 32302-1876  
Internet: [www.lawfla.com](http://www.lawfla.com)

February 8, 2006

**BY ELECTRONIC FILING**

Ms. Blanca Bayó, Director  
Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

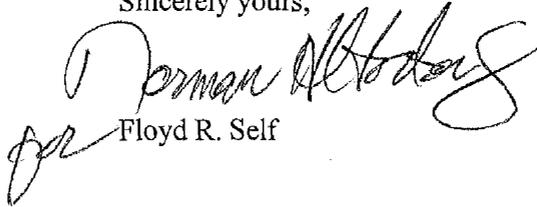
Re: Docket Nos. 050119-TP and 050125-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of T-Mobile USA, Inc. is an original and one copy of T-Mobile USA, Inc.'s Notice of Serving Objections and Responses to FPSC Staff's First Set of Interrogatories (Nos. 1-17) in the above referenced dockets.

Thank you for your assistance with this filing.

Sincerely yours,

  
Floyd R. Self

FRS/amb  
Enclosure  
cc: Parties of Record

DOCUMENT NUMBER-DATE

DOWNTOWN OFFICE, 215 South Monroe Street, Suite 701 • Tallahassee, FL 32301 • Phone (850) 222-0720 • Fax (850) 224-0359  
NORTHEAST OFFICE, 3116 Capital Circle, NE, Suite 5 • Tallahassee, FL 32308 • Phone (850) 668-5246 • Fax (850) 668-5613

01122 FEB-8 8

FPSC-COMMISSION CLERK

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint petition by TDS Telecom d/b/a TDS Telecom/Quincy Telephone; ALLTEL Florida, Inc.; Northeast Florida Telephone Company d/b/a NEFCOM; GTC, Inc. d/b/a GT Com; Smart City Telecommunications, LLC d/b/a Smart City Telecom; ITS Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC ["Joint Petitioners"] objecting to and requesting suspension and cancellation of proposed transit traffic service tariff filed by BellSouth Telecommunications, Inc.

DOCKET NO. 050119-TP

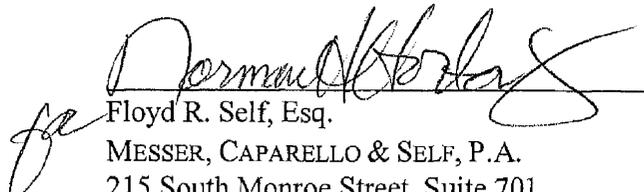
In re: Petition and complaint for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc., by AT&T Communications of the Southern States, LLC.

DOCKET NO. 050125-TP  
Filed: February 8, 2006

**NOTICE OF SERVING T-MOBILE USA, INC'S OBJECTIONS AND RESPONSES TO FPSC STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-17)**

T-Mobile USA, Inc. ("T-Mobile"), by and through its undersigned counsel, hereby files and serves Notice that it has served its Objections and Responses to FPSC Staff's First Set of Interrogatories (Nos. 1-17) by Electronic Mail on Felicia Banks, Esq. at [fbanks@psc.state.fl.us](mailto:fbanks@psc.state.fl.us) and by U. S. Mail at Office of General Counsel, Florida Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, Florida 32399-0850 on this 8<sup>th</sup> day of February, 2006.

Respectfully submitted,

  
Floyd R. Self, Esq.  
MESSER, CAPARELLO & SELF, P.A.  
215 South Monroe Street, Suite 701  
Tallahassee, Florida 32301  
(850) 222-0720 (voice)  
(850) 224-4359 (facsimile)  
[fself@lawfla.com](mailto:fself@lawfla.com)

DOCUMENT NUMBER-DATE

01122 FEB-8 8

FPSC-COMMISSION CLERK

Michele K. Thomas. Esq.  
T-Mobile USA, Inc.  
60 Wells Avenue  
Newton, MA 02459  
(973)981-1862  
Michele.Thomas@T-Mobile.com

Attorneys for T-Mobile USA, Inc.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by electronic mail and U. S. Mail this 8<sup>th</sup> day of February, 2006.

Felicia Banks, Esq.  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[fbanks@psc.state.fl.us](mailto:fbanks@psc.state.fl.us)

Kira Scott, Esq.  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[kscott@psc.state.fl.us](mailto:kscott@psc.state.fl.us)

Mr. Paul Vickery  
Division of Competitive Markets and  
Enforcement  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[kkennedy@psc.state.fl.us](mailto:kkennedy@psc.state.fl.us)

Stephen B. Rowell  
Bettye Willis  
ALLTEL  
One Allied Drive, B5F11  
Little Rock, AR 72202

Mr. James White  
ALLTEL  
6867 Southpoint Drive., N., Suite 103  
Jacksonville, FL 32216-8005  
[james.white@alltel.com](mailto:james.white@alltel.com)

Tracy W. Hatch  
Senior Attorney  
AT&T  
101 N. Monroe Street, Suite 700  
Tallahassee, FL 32301  
[thatch@att.com](mailto:thatch@att.com)

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

Nancy B. White  
R. Douglas Lackey  
Meredith Mays  
c/o Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301  
[nancysims@bellsouth.com](mailto:nancysims@bellsouth.com)

Benjamin H. Dickens, Esq.  
Blooston Law Firm  
2120 L Street, NW, Suite 300  
Washington, DC 20037  
[bhd@bloostonlaw.com](mailto:bhd@bloostonlaw.com)

Ms. Angie McCall  
Frontier Communications of the South, Inc.  
300 Bland Street  
Bluefield, WV 24701-3020  
[AmcCall@ezn.com](mailto:AmcCall@ezn.com)

Mr. Mark Beightol  
GT Com  
P.O. Box 220  
Port St. Joe, FL 32457-0220  
[mbeightol@fairpoint.com](mailto:mbeightol@fairpoint.com)

Mr. Robert M. Post, Jr.  
ITS Telecommunications Systems, Inc.  
P.O. Box 277  
Indiantown, FL 34956-0277  
[maryannh@itstelecom.net](mailto:maryannh@itstelecom.net)

Ms. Deborah Nobles  
NEFCOM  
505 Plaza Circle, Suite 200  
Orange Park, FL 32073-9409  
[dnobles@townes.net](mailto:dnobles@townes.net)

Kenneth A. Hoffinan, Esq.  
Rutledge Law Firm  
P.O. Box 551  
Tallahassee, FL 32302-0551  
[ken@reuphlaw.com](mailto:ken@reuphlaw.com)

Smart City Telecom  
P.O. Box 22555  
Lake Buena Vista, FL 32830-2555  
[ibhall@smartcity.com](mailto:ibhall@smartcity.com)

Mr. Thomas M. McCabe  
TDS Telecom/Quincy Telephone  
P.O. Box 189  
Quincy, FL 32353-0189  
[Thomas.mccabe@tdstelecom.com](mailto:Thomas.mccabe@tdstelecom.com)

Vicki Gordon Kaufman  
Moyle Flanigan Katz Raymond & Sheehan, P.A.  
118 North Gadsden Street  
Tallahassee, FL 32301  
[vkaufman@moylelaw.com](mailto:vkaufman@moylelaw.com)

Charles V. Gerkin, Jr.  
Friend Law Firm  
Three Ravinia Drive, Suite 1450  
Atlanta, GA 30346  
[cgerkin@fh2.com](mailto:cgerkin@fh2.com)

MetroPCS California/Florida, Inc.  
8144 Walnut Hill Lane, Suite 800  
Dallas, TX 75231

Mr. Ronald W. Gavillet  
Neutral Tandem-Florida, LLC  
One South Wacker, Suite 200  
Chicago, IL 60606  
[rgavillet@neutraltandem.com](mailto:rgavillet@neutraltandem.com)

Ms. Susan J. Berlin  
NuVox Communications, Inc.  
Two North main Street  
Greenville, SC 29601  
[sberlin@nuvox.com](mailto:sberlin@nuvox.com)

Susan Masterton  
Sprint Communications Company Limited Partnership  
P.O. Box 2214  
Tallahassee, FL 32316-2214  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

William R. Atkinson, Esq.  
Sprint Nextel (GA)  
Mail Stop GAATLD0602  
3065 Cumberland Circle, SE  
Atlanta, GA 30339  
[bill.atkinson@sprint.com](mailto:bill.atkinson@sprint.com)

Charles F. Palmer  
Troutman Sanders LLP  
600 Peachtree Street, N.E., Suite 5200  
Atlanta, GA 30328-2216  
[charles.palmer@troutmansanders.com](mailto:charles.palmer@troutmansanders.com)

Elaine D. Critides  
Verizon Wireless  
Legal & External Affairs Department  
1300 I Street, N.W., Suite 400 West  
Washington, DC 20005  
[elaine.critides@verizonwireless.com](mailto:elaine.critides@verizonwireless.com)

Michele K. Thomas, Esq.  
Sr. Corporate Counsel  
T-Mobile  
60 Wells Avenue  
Newton, MA 02459  
[Michele.Thomas@T-Mobile.com](mailto:Michele.Thomas@T-Mobile.com)

Michael A. Gross, Esq.  
Florida Cable Telecommunications Association  
246 E. 6<sup>th</sup> Avenue  
Tallahassee, FL 32303  
[mgross@fcta.com](mailto:mgross@fcta.com)

  
Floyd R. Self