

AUSLEY & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

February 25, 2004

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

Re: Docket No. 030852-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint's Second Request for Confidential Classification. **Please note that Exhibit B to this request contains a confidential document that is contained in a sealed envelope and should be maintained in the Commission's confidential files.**

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

Enclosures

cc: All Parties of Record (w/o confidential Exhibit B)

DOCUMENT NUMBER - DATE

02747 FEB 25 04

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

DOCKET NO. 030852-TP
Filed: 02/25/04

**SPRINT'S SECOND REQUEST
FOR CONFIDENTIAL CLASSIFICATION**

Sprint-Florida, Inc. and Sprint Communications Company, L.P., ("Sprint" or the "Company"), pursuant to Section 364.183, Florida Statute, and Rule 25-22.006, Florida Administrative Code, hereby files this Request for Confidential Classification, and states:

1. Sprint-Florida, Inc. and Sprint Communications Company, L.P. are telecommunications companies doing business in the State of Florida subject to the jurisdiction of the Florida Public Service Commission ("FPSC" or "Commission") and are parties of record in this docket.

2. On February 10, 2004, Sprint filed the confidential version of SPRINT-FLORIDA, INC.'S AND SPRINT COMMUNICATIONS COMPANY L.P.'S RESPONSES AND ANSWERS TO BELLSOUTH'S FIRST REQUEST FOR ADMISSIONS (NOS. 1-3), FIRST INTERROGATORIES (NOS. 4-7) AND SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS (No. 3) [hereinafter, the "Document"] with the Division of Commission Clerk and Administrative Services ("Clerk"), together with a Notice of Intent to Request Confidential Classification for portions thereof. Therein, Sprint asserted that certain information therein was confidential and designated the confidential information by highlighting it with a yellow marker. The Company's confidential filing was assigned

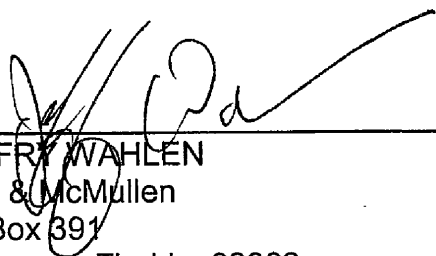
Document Number 01910-04. A non-confidential version (redacted) of the Document was contemporaneously delivered to the Clerk.

3. In accordance with the procedures set forth in Section 25-22.006(4), Florida Administrative Code, Sprint asserts that the highlighted information in the Document is "proprietary confidential business information" within the meaning of Section 364.183, Florida Statutes, and requests that the Commission keep that information confidential and exempt from public disclosure in accordance with Section 25-22.006(4), Florida Administrative Code.

4. Two edited versions of the Document with the confidential information redacted are attached as Exhibit "A." Another copy of the Document with the confidential information highlighted is included as Exhibit "B." The line-by-line identification and justification required by Rule 25-22.006(4)(c), Florida Administrative Code, is attached as Exhibit "C." The material for which confidential classification is claimed and sought is intended to be and is treated by the Company as private and has not been disclosed.

WHEREFORE, Sprint respectfully requests that the Commission grant this Request for Confidential Classification.

DATED this 25th day of February, 2004.



J. JEFFREY WAHLEN
Ausley & McMullen
P. O. Box 391
Tallahassee, Florida 32302
(850) 425-5471
(850) 222-7560 (fax)
iwahlen@ausley.com

ATTORNEYS FOR SPRINT-FLORIDA, INC.
and SPRINT COMMUNICATIONS COMPANY
LIMITED PARTNERSHIP

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

DOCKET NO. 030852-TP
Filed: 02/25/04

SPRINT'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION

Edited Version (Public)

Confidential Information Redacted

Exhibit A

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

DOCKET NO. 030852-TP
Filed: February 10, 2004

**SPRINT-FLORIDA, INC.'S AND
SPRINT COMMUNICATIONS COMPANY L.P.'S
CONFIDENTIAL
RESPONSES AND ANSWERS TO BELL SOUTH'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1-3),
FIRST INTERROGATORIES (NOS. 4-7)
AND SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (No. 3)**

Sprint-Florida, Inc. and Sprint Communications Company, L.P., ("Sprint") pursuant Rule 28-106.206, Florida Administrative Code, and Rules 1.280, 1.340, 1.350, and 1.370, Florida Rules of Civil Procedure, hereby submits the following Responses and Answers to BellSouth's First Request for Admissions (Nos. 1-3), First Interrogatories (Nos. 4-7) and Second Request for Production of Documents (No. 3), served on January 21, 2004 (collectively, "Discovery Requests"). The Answers to Interrogatory Nos. 4-7 were provided by Kent Dickerson.

I. GENERAL OBJECTIONS.

Sprint makes the following General Objections to the Discovery Requests, which general objections are incorporated by reference into Sprint's specific responses and answers to the individual responses and answer to the requests for admission, interrogatories and request to produce below:

1. Sprint objects to the Definitions of "Sprint," in paragraph 3 of the Definitions section the extent that such Definitions seek to impose an obligation on

Sprint to respond on behalf of subsidiaries, affiliates, or other persons which are not parties to this proceeding on the grounds that such Definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Without waiving this General Objection, and subject to other general and specific Objections, where provided, answers will be provided on behalf of Sprint-Florida, Incorporated and Sprint Communications Company Limited Partnership, which are the certificated carriers authorized to provide regulated telecommunications services in Florida, and which are parties to this proceeding, relative, however, only to their intrastate operations in Florida.

2. Sprint objects to each and every request for admission, interrogatory and request to produce in the Discovery Request and the Instructions therein to they seek information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

3. Sprint objects to each and every request for admission, interrogatory and request to produce in the Discovery Request and the Instructions insofar as they are vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations, but are not properly defined or explained for purposes of these Interrogatories. Where provided, answers provided by Sprint to BellSouth's Discovery Requests will be provided subject to, and without waiving, this General Objection.

4. Sprint objects to each and every request for admission, interrogatory and request to produce in the Discovery Request and the Instructions insofar as they are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this proceeding.

5. Sprint objects to request for admission, interrogatory and request to produce in the Discovery Request and the Instructions to the extent they seek to impose obligations on Sprint that exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

6. Sprint objects to answering any request for admission, interrogatory and request to produce in the Discovery Request and the Instructions to the extent such Interrogatory seeks responsive information already is in the public domain, or otherwise on record with the Commission or the Federal Communications Commission ("FCC").

7. Sprint objects to each request for admission, interrogatory and request to produce in the Discovery Request and the Instructions to which it is unduly burdensome, expensive, oppressive, or excessively time consuming for response thereto as written.

8. Sprint objects to each Interrogatory to the extent such Interrogatory seeks responsive information that constitutes (a) "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes and/or "proprietary confidential business information" within the meaning of Section 364.183(3), Fla. Stat. To the extent any Interrogatory seeks proprietary business information that is not subject to a "trade secrets" privilege, and Sprint makes such responsive information available to BellSouth, Sprint only will make responsive information available to counsel for Sprint pursuant to an appropriate Protective Agreement, and subject to any requirements of the Commission relative to protecting such proprietary business information.

9. Sprint is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Sprint creates numerous

documents that are not subject to either Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is impossible for Sprint to affirm that every responsive document in existence has been provided in response to an Interrogatory. Instead, where provided, Sprint's responses will provide all of the information obtained by Sprint after a reasonable and diligent search conducted in connection the Interrogatory. Such search will include only a review of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, Sprint objects on the ground that compliance would be unduly burdensome.

**SPRINT
DOCKET NO. 030852-TP
BELLSOUTH'S RFA NO. 1
PAGE 1 OF 1**

1. Please admit that SPRINT has deployed high capacity transport facilities to each of the central offices (identified by CLLI code) listed in the confidential attachment to this discovery.

RESPONSE:

**SPRINT
DOCKET NO. 030852-TP
BELLSOUTH'S RFA NO. 2
PAGE 1 OF 1**

2. Please admit that SPRINT can route or transport traffic using SPRINT's own facilities between any pair of central offices to which it has deployed high capacity transport facilities. This includes routing or transporting traffic directly between the central offices or indirectly through an intermediate aggregation point, such as SPRINT's switch or the switch of another CLEC.

RESPONSE:

**SPRINT
DOCKET NO. 030852-TP
BELLSOUTH'S RFA NO. 3
PAGE 1 OF 1**

3. Please admit that SPRINT has fiber based collocation arrangements at the central offices (identified by CLLI code) listed in the confidential attachment to this discovery.

RESPONSE:

**SPRINT
DOCKET NO. 030852-TP
BELLSOUTH'S IRR NO. 4
PAGE 1 OF 1**

4. If SPRINT has denied any of the previous Requests for Admissions, state all facts and identify all documents that support such denial.

ANSWER:

Subject to its general objections, which are incorporated herein by reference, Sprint answers that the facts are included in Sprint's Response to RFA Nos. 1, 2 and 3, and that there are no documents responsive to this request.

**SPRINT
DOCKET NO. 030852-TP
BELLSOUTH'S IRR NO. 5
PAGE 1 OF 1**

5. If SPRINT has admitted any portion of Request for Admission 1, please describe with particularity the nodes or termination points along the route.

ANSWER:

NA

**SPRINT
DOCKET NO. 030852-TP
BELLSOUTH'S IRR NO. 6
PAGE 1 OF 1**

6. If SPRINT has deployed any high capacity loop facilities in any of the Southeastern states, please provide the percentage of buildings where SPRINT installed its own inside wiring, the percentage of buildings where SPRINT is leasing inside wiring from another carrier, including the ILEC, and the percentage of buildings where SPRINT is using inside wiring owned by the building owner. In each of these situations, please describe with specificity the cost paid for installing or leasing the inside wire in buildings.

OBJECTIONS:

Sprint objects to Interrogatory No. 6 on grounds that the term "southeastern states" contained therein causes the interrogatory to be overbroad, burdensome and seek information that is not relevant or calculated to lead to the discovery of admissible evidence in this case. Specifically, Sprint objects to the interrogatory to the extent that it calls for information about Sprint's operations in states other than Florida. Without waiving its general objections or this specific objection, Sprint's answer below responds to Interrogatory No. 6 as it relates to Florida only.

ANSWER:

1 Subject to the foregoing objections, which are incorporated herein by reference,
2 Sprint states that, in the state of Florida,
3
4

SPRINT
DOCKET NO. 030852-TP
BELLSOUTH'S IRR NO. 7
PAGE 1 OF 1

7. With reference to the responses of Orlando Telephone Company to Staff's TRO Data Requests, certain customer locations were listed for Sprint is identified as the loop owner, and which are listed on the confidential attachment to this discovery. Please describe with particularity the terms under which Sprint is providing access to Orlando Telephone Company to these locations; including but not limited to, whether Sprint is a wholesaler of high capacity loops and whether Sprint is providing any other carriers access over its facilities to these locations.

ANSWER:

- 1 Subject to its general objections, which are incorporated herein by reference,
2 Sprint states that


**SPRINT
DOCKET NO. 030852-TP
BELLSOUTH'S POD NO. 3
PAGE 1 OF 1**

8. Produce any documents identified above.

RESPONSE:

Subject to its general objections, which are incorporated herein by reference, Sprint states that all documentation referencing Sprint's collocations in BellSouth central offices is maintained on BellSouth's collocation website.

DATED this 10th day of February, 2004.



J. JEFFRY WAHLEN
Ausley & McMullen
P. O. Box 391
Tallahassee, Florida 32302
(850) 425-5471
(850) 222-7560 (fax)
jwahlen@ausley.com

ATTORNEYS FOR SPRINT-FLORIDA, INC.
and SPRINT COMMUNICATIONS COMPANY
LIMITED PARTNERSHIP

AFFIDAVIT

STATE OF KANSAS
COUNTY OF Johnson

BEFORE ME, the undersigned authority, personally appeared KENT W. DICKERSON, who deposed and said that he is employed as Director - Cost Support for Sprint/United Management Company, and that Sprint's answers to BellSouth's First Set of Interrogatories (Nos. 4-7) are correct to the best of his information and belief.

DATED this 10th day of February, 2004.

Kent W. Dickerson

KENT W. DICKERSON

The foregoing instrument was acknowledged before me this 10th day of February, 2004, by KENT W. DICKERSON, who is personally known to me.

Debbie K Draper

Notary

Debbie K Draper

printed name

Analyst - Costing

Title, Rank, Serial No., etc.

My Commission Expires: June 4 2005

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished via Electronic

Mail, U. S. Mail or Hand Delivery (*) 10th day of February, 2004, to the following:

Adam Teitzman *
Beth Keating *
Division of Legal Services
Florida Public Service Comm.
Division of Legal Services
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Phone: (850) 413-6212
Fax: (850) 413-6250
ateitzman@psc.state.fl.us
bkeating@psc.state.fl.us

Tracy Hatch
AT&T
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549
Phone: (850) 425-6364
thatch@att.com

Lisa A. Sapper
AT&T
1200 Peachtree Street, N.E., Ste. 8100
Atlanta, GA 30309-3579
Phone: (404) 810-7812
lisariley@att.com

Charles V. Gerkin, Jr.
Regulatory Counsel
Allegiance Telecom, Inc.
9201 North Central Expressway
Dallas, TX 75231
Phone: (469) 259-4051
Fax: (770) 234-5945
Cell: (770) 855-0466
charles.gerkin@algx.com

Terry Larkin
Allegiance Telecom, Inc.
700 East Butterfield Road, Ste. 400
Lombard, IL 60148
Phone: (630) 522-6453
terry.larkin@algx.com

Nancy H. Sims
Nancy White
Doug Lackey
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556
Phone: (850) 224-7798
Fax: (850) 222-8640
nancy.sims@bellsouth.com

Bill Magness
Casey & Gentz, L.L.P.
919 Congress Avenue, Suite 1060
Austin, TX 78701
Phone: (512) 225-0019
Fax: (512) 480-9200

Charles E. Watkins
Covad
1230 Peachtree Street, NE, 19th Floor
Atlanta, GA 30309-3574
Phone: (404) 942-3492
Fax: (404) 492-3495
gwatkins@covad.com
jbelle@covad.com

Matthew Feil
Scott Kassman
FDN Communications
390 North Orange Avenue, Suite 2000
Orlando, FL 32801-1640
Phone: (407) 835-0460
Fax: (407) 835-0309
mfell@mail.fdn.com
skassman@mail.fdn.com

Nanette Edwards
Director – Regulatory
ITC^Delta Com
4092 South Memorial Parkway
Huntsville, AL 35802
Phone: (256) 382-3856
nedwards@itcdeltacom.com

Donna C. McNulty
MCI WorldCom Communications, Inc.
1203 Governors Square Blvd., Suite 201
Tallahassee, FL 32301-2960
Phone: (850) 219-1008
Fax: (850) 219-1018
donna.mculty@mci.com

Floyd Self
Norman H. Horton
Messer, Caparello & Self
ITC DeltaCom
MCI
KMC
Xspedius
215 South Monroe Street, Suite 701
Tallahassee, FL 32301
fself@lawfla.com
nhorton@lawfla.com

Jake E. Jennings
NewSouth Communications Corp.
Two North Main Center
Greenville, SC 29601-2719
Phone: (864) 672-5877
Fax: (864) 672-5313
jejennings@newsouth.com

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Kaufman & Arnold P.A.
FCCA
117 S. Gadsden Street
Tallahassee, FL 32301
imcglathlin@mac-law.com
vkaufman@mac-law.com

Marva Brown Johnson
KMCTelecom III, LLC
1755 North Brown Road
Lawrenceville, GA 30043-8119
Phone: (678) 985-6261
Fax: (678) 985-6213
marva.Johnson@kmctelecom.com

De O'Roark
MCI WorldCom Communications, Inc. (GA)
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328
de.oroark@mci.com

Jon Moyle, Jr.
Moyle Law Firm
NuVox Communications, Inc.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
Phone: (850) 681-3828
Fax: (850) 681-8788
jmoylejr@moylelaw.com

Bo Russell
NuVox Communications, Inc.
301 North Main Street
Greenville, SC 29601-2171
Phone: (864) 331-7323
brussell@nuvox.com

Richard Chapkis
Kimberly Caswell
Verizon Florida, Inc.
One Tampa City Center
201 North Franklin Street (33602)
P. O. Box 110, FLTC0007
Tampa, FL 33601-0110
Phone: (813) 483-2606
Fax: (813) 204-8870
Richard.chapkis@verizon.com

Rabinai E. Carson
Xspedius Communications
5555 Winghaven Blvd., Suite 300
O'Fallon, MO 63366-3868
Phone: (301) 361-4220
Fax: (301) 361-4277
rabinai.Carson@xspedius.com

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecom. Association
246 East 6th Avenue, Suite 100
Tallahassee, FL 32303
Phone: (850) 681-1990
Fax: (850) 681-9676
mgross@fcta.com

Susan S. Masterton
Sprint-Florida, Inc.
Sprint Communications Co. L.P.
1313 Blair Stone Road
P. O. Box 2214
Tallahassee, FL 32316-2214
Phone: (850) 599-1560
Fax: (850) 878-0777
susan.masterton@mail.sprint.com

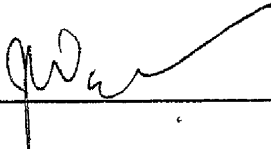
Jean Houck
Business Telecom, Inc.
4300 Six Forks Road
Raleigh, NC 27609
Phone: (919) 863-7325
jean.houck@btitelecom.com

Jorge Cruz-Bustillo
Assistant General Counsel
Supra Telecommunications
2620 S.W. 27th Avenue
Miami, FL 33133
Phone: (305) 476-4252
Fax: (305) 443-1078
Jorge.cruz-bustillo@stis.com

Jonathan Audu
Manager, Regulatory Affairs
Supra Telecommunications
1311 Executive Center Drive, Suite 220
Tallahassee, FL 32301-5027
Phone: (850) 402-0510
Fax: (850) 402-0522
jonathan.audu@stis.com

Charles Beck
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., Rm. 812
Tallahassee, FL 32399-1400
beck.charles@leg.state.fl.us

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Attorney

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

DOCKET NO. 030852-TP
Filed: 02/25/04

SPRINT'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION

Line-by-line Analysis

<u>Page</u>	<u>Lines</u>	<u>Columns</u>	<u>Explanation</u>
5	Entire	Response	Note 1
6	Entire	Response	Note 2
7	Entire	Response	Note 2
10	2-4	Data	Note 3
11	2	Data	Note 4

Note 1: This answer identifies the locations where Sprint uses (1) dark fiber from BellSouth on a UNE basis, (2) its own facilities, and (3) fiber leased from third parties to connect loops that terminate in the collocation to a Sprint switch. This data shows detailed components of Sprint's network and how it has configured its network to provide CLEC services to customers and potential customers in Florida. This type of data can be used to determine Sprint's plans and abilities to compete for customers in the telecommunication markets. This type of data for Sprint's competitors is not publicly available; therefore, disclosing this data to the public would put Sprint at a disadvantage relative to its competitors, thereby harming Sprint.

Note 2: This response provides detailed information about the manner in which Sprint routes traffic on certain routes and whether Sprint leases, self-provisions or uses BellSouth UNEs on those routes. This response shows detailed components of Sprint's network and how it has configured its network to provide CLEC services to customers and potential customers in Florida. This type of data can be used to determine Sprint's plans and abilities to compete for customers in the telecommunication markets. This type of data for Sprint's competitors is not publicly available; therefore, disclosing this data to the public would put Sprint at a disadvantage relative to its competitors, thereby harming Sprint.

Exhibit C
1 of 2

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

DOCKET NO. 030852-TP
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SPRINT'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION

Line-by-line Analysis

- Note 3: This response describes the arrangements that Sprint usually makes for inside wire in locations where Sprint has deployed high capacity loop facilities in Florida and how those arrangements are accounted for on the books and records of Sprint. This type of information can be used to determine Sprint's plans and abilities to compete for customers in the telecommunication markets. This type of data for Sprint's competitors is not publicly available; therefore, disclosing this data to the public would put Sprint at a disadvantage relative to its competitors, thereby harming Sprint.
- Note 4: This answer describes the operating relationship that Sprint has with another carrier and whether and how Sprint may be providing access at particular customer locations. This type of information can be used to determine Sprint's plans and abilities to compete for customers in the telecommunication markets. This type of data for Sprint's competitors is not publicly available; therefore, disclosing this data to the public would put Sprint at a disadvantage relative to its competitors, thereby harming Sprint.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing without Exhibit B has been furnished via Electronic Mail, U. S. Mail or Hand Delivery (*) 25th day of February, 2004, to the following:

Adam Teitzman *
Beth Keating *
Division of Legal Services
Florida Public Service Comm.
Division of Legal Services
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Phone: (850) 413-6212
Fax: (850) 413-6250
ateitzman@psc.state.fl.us
bkeating@psc.state.fl.us

Tracy Hatch
AT&T
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549
Phone: (850) 425-6364
thatch@att.com

Lisa A. Sapper
AT&T
1200 Peachtree Street, N.E., Ste. 8100
Atlanta, GA 30309-3579
Phone: (404) 810-7812
lisariley@att.com

Charles V. Gerkin, Jr.
Regulatory Counsel
Allegiance Telecom, Inc.
9201 North Central Expressway
Dallas, TX 75231
Phone: (469) 259-4051
Fax: (770) 234-5945
Cell: (770) 855-0466
charles.gerkin@algx.com

Terry Larkin
Allegiance Telecom, Inc.
700 East Butterfield Road, Ste. 400
Lombard, IL 60148
Phone: (630) 522-6453
terry.larkin@algx.com

Nancy H. Sims
Nancy White
Doug Lackey
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556
Phone: (850) 224-7798
Fax: (850) 222-8640
nancy.sims@bellsouth.com

Bill Magness
Casey & Gentz, L.L.P.
919 Congress Avenue, Suite 1060
Austin, TX 78701
Phone: (512) 225-0019

Charles E. Watkins
Covad
1230 Peachtree Street, NE, 19th Floor
Atlanta, GA 30309-3574
Phone: (404) 942-3492

Fax: (512) 480-9200

Matthew Feil
Scott Kassman
FDN Communications
390 North Orange Avenue, Suite 2000
Orlando, FL 32801-1640
Phone: (407) 835-0460
Fax: (407) 835-0309
mfeil@mail.fdn.com
skassman@mail.fdn.com

Nanette Edwards
Director – Regulatory
ITC^Delta Com
4092 South Memorial Parkway
Huntsville, AL 35802
Phone: (256) 382-3856
nedwards@itcdeltacom.com

Donna C. McNulty
MCI WorldCom Communications, Inc.
1203 Governors Square Blvd., Suite 201
Tallahassee, FL 32301-2960
Phone: (850) 219-1008
Fax: (850) 219-1018
donna.mcnulty@mci.com

Floyd Self
Norman H. Horton
Messer, Caparelllo & Self
ITC DeltaCom
MCI
KMC
Xspedius
215 South Monroe Street, Suite 701
Tallahassee, FL 32301
fself@lawfla.com
nhorton@lawfla.com

Jake E. Jennings
NewSouth Communications Corp.
Two North Main Center
Greenville, SC 29601-2719
Phone: (864) 672-5877

Fax: (404) 492-3495
gwatkins@covad.com
jbelle@covad.com
Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Kaufman & Arnold P.A.
FCCA
117 S. Gadsden Street
Tallahassee, FL 32301
jmclglothlin@mac-law.com
vkaufman@mac-law.com

Marva Brown Johnson
KMCTelecom III, LLC
1755 North Brown Road
Lawrenceville, GA 30043-8119
Phone: (678) 985-6261
Fax: (678) 985-6213
marva.johnson@kmctelecom.com

De O'Roark
MCI WorldCom Communications, Inc. (GA)
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328
de.oroark@mci.com

Jon Moyle, Jr.
Moyle Law Firm
NuVox Communications, Inc.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
Phone: (850) 681-3828
Fax: (850) 681-8788
jmoylejr@moylelaw.com

Bo Russell
NuVox Communications, Inc.
301 North Main Street
Greenville, SC 29601-2171
Phone: (864) 331-7323

Fax: (864) 672-5313
jeennings@newsouth.com

Richard Chapkis
Kimberly Caswell
Verizon Florida, Inc.
One Tampa City Center
201 North Franklin Street (33602)
P. O. Box 110, FLTC0007
Tampa, FL 33601-0110
Phone: (813) 483-2606
Fax: (813) 204-8870
Richard.chapkis@verizon.com

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecom. Association
246 East 6th Avenue, Suite 100
Tallahassee, FL 32303
Phone: (850) 681-1990
Fax: (850) 681-9676
mgross@fcta.com

Jean Houck
Business Telecom, Inc.
4300 Six Forks Road
Raleigh, NC 27609
Phone: (919) 863-7325
jean.houck@btitelecom.com

Jonathan Audu
Manager, Regulatory Affairs
Supra Telecommunications
1311 Executive Center Drive, Suite 220
Tallahassee, FL 32301-5027
Phone: (850) 402-0510
Fax: (850) 402-0522
jonathan.audu@stis.com

brussell@nuvox.com

Rabinai E. Carson
Xspedius Communications
5555 Winghaven Blvd., Suite 300
O'Fallon, MO 63366-3868
Phone: (301) 361-4220
Fax: (301) 361-4277
rabinai.Carson@xspedius.com

Susan S. Masterton
Sprint-Florida, Inc.
Sprint Communications Co. L.P.
1313 Blair Stone Road
P. O. Box 2214
Tallahassee, FL 32316-2214
Phone: (850) 599-1560
Fax: (850) 878-0777
susan.masterton@mail.sprint.com

Jorge Cruz-Bustillo
Assistant General Counsel
Supra Telecommunications
2620 S.W. 27th Avenue
Miami, FL 33133
Phone: (305) 476-4252
Fax: (305) 443-1078
Jorge.cruz-bustillo@stis.com

Charles Beck
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., Rm. 812
Tallahassee, FL 32399-1400
beck.charles@leg.state.fl.us

Attorney

