

HOPPING GREEN SAMS & SMITH  
PROFESSIONAL ASSOCIATION  
ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET  
POST OFFICE BOX 6526  
TALLAHASSEE, FLORIDA 32314

(850) 222-7500

FAX (850) 224-8551

FAX (850) 425-3415

www.hgss.com

Writer's Direct Dial No.  
(904) 425-2313

September 13, 2000

ORIGINAL

JAMES S. ALVES  
BRIAN H. BIBEAU  
RICHARD S. BRIGHTMAN  
KEVIN B. COVINGTON  
PETER C. CUNNINGHAM  
RALPH A. DeMEO  
WILLIAM H. GREEN  
WADE L. HOPPING  
GARY K. HUNTER, JR.  
JONATHAN T. JOHNSON  
LEIGH H. KELLETT  
ROBERT A. MANNING  
FRANK E. MATTHEWS  
RICHARD D. MELSON  
ANGELA R. MORRISON  
SHANNON L. NOVEY  
ERIC T. OLSEN

GARY V. PERKO  
MICHAEL P. PETROVICH  
DAVID L. POWELL  
JOHN K. POWELL  
WILLIAM D. PRESTON  
CAROLYN S. RAEPPEL  
DOUGLAS S. ROBERTS  
D. KENT SAFRIET  
GARY P. SAMS  
TIMOTHY G. SCHOENWALDER  
ROBERT P. SMITH  
DAN R. STENGLE  
CHERYL G. STUART  
W. STEVE SYKES  
OF COUNSEL  
ELIZABETH C. BOWMAN

Blanca S. Bayó  
Director, Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
00 SEP 13 PM 4:37  
RECORDS AND REPORTING

Re: UNE Docket No. 990649-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Rhythms Links Inc. is the Notice of Service of its Responses to Staff's First Set of Interrogatories (Nos. 13-23) and First Request for Production of Documents (No. 7).

By copy of this letter, this document has been furnished to the parties on the attached service list.

Very truly yours,

Richard D. Melson

RDM/kcg  
Enclosures  
cc: Parties of Record

129471.5

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11433 SEP 13 00

FPSC-RECORDS/REPORTING

DP  
AF  
MP  
OM  
TR  
CR  
EG  
PC  
AI  
GO  
EC  
ER  
TH

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 990649-TP

Filed: September 13, 2000

RHYTHMS LINKS INC.'S NOTICE OF SERVICE  
OF RESPONSES TO STAFF'S FIRST SET OF INTERROGATORIES (Nos. 13-23)  
AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (No. 7)

Rhythm Links Inc. hereby gives notice of service of its  
Responses to Staff's First Set of Interrogatories (Nos. 13-23) and  
First Request for Production of Documents (No. 7).

RESPECTFULLY SUBMITTED this 13th day of September, 2000.

HOPPING GREEN SAMS & SMITH, P.A.

By: \_\_\_\_\_



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

ATTORNEY FOR RHYTHMS LINKS INC.

DOCUMENT NUMBER-DATE

11433 SEP 13 2000

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 (\*) this 13th day of September, 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

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

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.spire 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  
Verizon Select Services, Inc.  
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

Cathy Boone  
Covad Communications, Co.  
10 Glen Lake Parkway  
Suite 650  
Atlanta, GA 30328

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

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  
Five Corporate Centre  
801 Crescent Centre Drive  
Suite 600  
Franklin, TN 37067

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

Genevieve Morelli  
Eric D. Jenkins  
Kelley Dry & Warren, LLP  
1200 19<sup>th</sup> Street, NW,  
Fifth Floor  
Washington, DC 20036

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

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

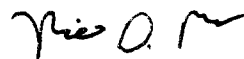
Network Access Solutions  
Corporation  
100 Carpenter Drive, Suite 206  
Sterling, VA 20164

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

Jim Lamoureux, Esq.  
AT&T Communications of the  
Southern States, Inc.  
1200 Peachtree Street.  
Suite 8068  
Atlanta, GA 30309



---

Attorney