

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition for Arbitration of an Interconnection Agreement Between BellSouth Telecommunications, Inc. and US LEC of Tennessee Inc. Pursuant to the Telecommunications Act of 1996*

Docket No. 00-00053

MOTION TO EXCEED FORTY (40) DISCOVERY REQUESTS

Pursuant to TRA Rule 1220-1-2-.11(5), US LEC of Tennessee Inc. moves to file the attached discovery requests.

This is an arbitration proceeding conducted pursuant to 42 U.S.C. § 252. As the Authority is aware, such proceedings are usually more complex and time consuming than other kinds of contested case proceedings. In this case, for example, there are nine substantive issues. US LEC has propounded 102 discovery questions, or approximately eleven questions per issue. Given the complexity of this proceeding and the fact that BellSouth is in possession of much of the information US LEC needs to present its case, US LEC's request is not excessive per se¹.

US LEC therefore asks that it be allowed to submit all of the attached discovery questions.

Respectfully submitted,


Henry Walker

¹ Any party, of course, may still object to particular discovery requests on the grounds that a request is overly burdensome or irrelevant.