**Kimberly Caswell** 

Vice President and General Counsel, Southeast Legal Department





FLTC0007 201 North Franklin Street (33602) Post Office Box 110 Tampa, Florida 33601-0110

Phone 813 483-2606 Fax 813 204-8870 kimberly.caswell@verizon.com

April 15, 2002

Ms. Blanca S. Bayo, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re:

Docket No. 990649B-TP

Investigation into Pricing of Unbundled Network Elements (Sprint/Verizon track)

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of Verizon Florida Inc.'s Notices of Service of Responses and Objections to Staff's Eighth Set of Interrogatories (Nos. 216-299) and Seventh Request for Production of Documents (Nos. 71-92) in the above matter. Also enclosed are an original and 15 copies of a Request for Confidential Classification in connection with Verizon's responses to POD Nos. 73, 78 and 92. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

AUS & KC:tas CAF **CMP** Enclosures COM

CTR ECR GCL OPC MMS SEC OTH

11:01 MA 21 894 SD DISTRIBUTION CENTER

DOCUMENT NUMBER - DATE

04132 APR 158

FPSC-COMMISSION CLERK

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network elements (Sprint/Verizon track)

Docket No. 990649B-TP Filed: April 15, 2002

# NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S RESPONSES AND OBJECTIONS TO STAFF'S SEVENTH REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 71-92)

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Responses and Objections to Staff's Seventh Request for Production of Documents (Nos. 71-92), which were legally propounded by Staff on March 29, 2002, was sent via overnight delivery on April 12, 2002 and electronic mail on April 15, 2002, to Jason K. Fudge, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

The original and one copy of this Notice were also sent via overnight delivery on April 12, 2002 to the Director, Division of the Commission Clerk and Administrative Services at the Commission. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on April 15, 2002.

By: Kimberly Caswell

P. O. Box 110, FLTC0007

Tampa, Florida 33601

Telephone: 813-483-2617

Attorney for Verizon Florida Inc.

DOCUMENT NUMBER DATE

O4132 APR 158

FPSC-COMMISSION CLERK

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network elements (Sprint/Verizon track)

Docket No. 990649B-TP Filed: April 15, 2002

# NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S RESPONSES AND OBJECTIONS TO STAFF'S EIGHTH SET OF INTERROGATORIES (NOS. 216-299)

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Responses and Objections to Staff's Eighth Set of Interrogatories (Nos. 216-299), which were legally propounded by Staff on March 29, 2002, was sent via overnight delivery on April 12, 2002 and electronic mail on April 15, 2002, to Jason K. Fudge, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

The original and one copy of this Notice were also sent via overnight delivery on April 12, 2002 to the Director, Division of the Commission Clerk and Administrative Services at the Commission. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on April 15, 2002.

By:

Kimberly Caswell

P. O. Box 110, FLTC0007

Tampa, Florida 33601

Telephone: 813-483-2617

Attorney for Verizon Florida Inc.

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Notice of Service and Responses and Objections to Staff's Eighth Set of Interrogatories (Nos. 216-299) and Notice of Service of Responses and Objections to Staff's Seventh Request for Production of Documents (Nos. 71-92), and Request for Confidential Classification in Docket No. 990649B-TP were sent via electronic mail and/or U.S. mail on April 15, 2002 to the parties on the attached list.

Kimberly Caswell

Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Pennington Law Firm \*
Marc W. Dunbar
Karen M. Camechis
215 S. Monroe St., 2<sup>nd</sup> Floor
Tallahassee, FL 32301

AT&T \*
Marsha Rule
101 N. Monroe Street
Suite 700
Tallahassee, FL 32301-1549

BellSouth Telecommunications \*
Nancy B. White
c/o Nancy H. Sims
150 South Monroe St., Suite 400
Tallahassee, FL 32301-1556

Florida Cable Telecomm. Assoc. \* Michael A. Gross 246 East 6<sup>th</sup> Avenue, Suite 100 Tallahassee, FL 32303

Florida Public Tele. Assoc. c/o David Tobin Tobin and Reyes 7251 W. Palmetto Park Road Suite 205 Boca Raton, FL 33433

MCI WorldCom Inc. \*
Donna Canzano McNulty
The Atrium Building, Suite 105
325 John Knox Road
Tallahassee, FL 32303-4131

John Spilman Broadslate Networks Inc. 585 Loblolly Lane Charlottesville, VA 22903-7656 Brent E. McMahan VP-Reg./Govt. Affairs Network Telephone Corp. 815 South Palafox Street Pensacola, FL 32501

Time Warner Telecom \*
Carolyn Marek
233 Bramerton Court
Franklin, TN 37069

Joseph McGlothlin \*
McWhirter Reeves Law Firm
117 S. Gadsden Street
Tallahassee, FL 32301

Stephen C. Reilly Office of Public Counsel 111 W. Madison Street Room 812 Tallahassee, FL 32399-1400

Bruce May Holland Law Firm 315 S. Calhoun Street Suite 600 Tallahassee, FL 32301

Richard D. Melson \*
Gabriel E. Nieto
Hopping Law Firm
123 S. Calhoun Street
Tallahassee, FL 32314

Jim Lamoureux\*
Virginia Tate\*
AT&T
1200 Peachtree Street
Suite 8100
Atlanta, GA 30309

Mark Buechele Supra Telecommunications Koger Center-Ellis Building 1311 Executive Center Drive Suite 200 Tallahassee, FL 32301-5027 Vicki Gordon Kaufman \*
McWhirter Reeves Law Firm
117 South Gadsden Street
Tallahassee, FL 32301

Gregory J. Darnell \*
MCI WorldCom Inc.
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328

Charles Rehwinkel \*
Susan Masterton\*
Sprint-Florida
1313 Blairstone Road
MC FLTLHO0107
Tallahassee, FL 32301

Catherine F. Boone \*
Covad Comm. Co.
1230 Peachtree Street NE
19<sup>th</sup> Floor
Atlanta, GA 30309

George S. Ford\*
Chief Economist
Z-Tel Communications Inc.
601 S. Harbour Island Blvd.
Tampa, FL 33602

Jonathan E. Canis Michael B. Hazzard Kelley Drye & Warren 1200 19<sup>th</sup> St. NW, 5<sup>th</sup> Floor Washington, DC 20036 Rodney L. Joyce Shook Hardy & Bacon LLP 600 14<sup>th</sup> St. N.W., Suite 800 Washington, DC 20005-2004

Tracy W. Hatch/Floyd R. Self\* Messer Law Firm 215 S. Monroe Street Suite 701 Tallahassee, FL 32302 Eric Branfman\* Swidler & Berlin 3000 K Street NW, Suite 300 Washington, DC 20007-5116 Florida Digital Network, Inc. 390 North Orange Avenue Suite 2000 Orlando, FL 32801

Charles Pellegrini
Patrick Wiggins
Katz Kutter Law Firm
106 East College Avenue
12<sup>th</sup> Floor
Tallahassee, FL 32301

Network Access Solutions Corp. 13650 Dulles Technology Drive Herndon, VA 20171-4602 John D. McLaughlin, Jr. KMC Telecom III, Inc. 1755 North Brown Road Lawrenceville, GA 30034

Nanette Edwards ITC^DeltaCom 4092 S. Memorial Parkway Huntsville, AL 35802

William H. Weber Covad Communications Co. 19<sup>th</sup> Floor, Promenade II 1230 Peachtree Street N.E. Atlanta, GA 30309