Dorothy Menasco

From:	Scobie, Teresa A (Terry) [terry.scobie@verizon.com]
Sent:	Monday, December 12, 2011 1:58 PM
To:	Filings@psc.state.fl.us

Subject: Docket No. 090538-TP - Verizon Access's Notice of Service of Objections and Responses to Staff's First Set of Interrogatories

Attachments: 090538 VZ Notice-Svc-Responses to Staff 1st INTS.pdf



The attached is submitted for filing in Docket No. 090538-TP on behalf of Verizon Access by

Dulaney L. O'Roark III P. O. Box 110, MC FLTP0007 Tampa, Florida 33601-0110 (678) 259-1657 <u>de.oroark@verizon.com</u>

The attached document consists of a total of 6 pages - cover letter (1 page), Notice (2 pages) and Certificate of Service (3 pages).

Terry Scobie Legal Secretary II Verizon Legal Department P. O. Box 110 - MC FLTP0007 Tampa, Florida 33601-0110 813-483-2610 (tel) 813-204-8870 (fax) terry.scobie@verizon.com

0001 MEND NUMPERIDATE 08950 DEC 14 = FPSC-COMMISSION CLERK Dulaney L. O'Roark III General Counsel-Southern Region Legal Department



5055 North Point Parkway Alpharetta, Georgia 30022

Phone 678-259-1657 Fax 678-259-5326 de.oroark@verizon.com

December 12, 2011 - VIA ELECTRONIC MAIL

Ann Cole, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 090538-TP

Complaint of Qwest Communications Company, LLC against MCImetro Access Transmission Services (d/b/a Verizon Access Transmission Services); XO Communications Services, Inc.; tw telecom of florida, I.p.; Granite Telecommunications, LLC; Cox Florida Telcom, L.P.; Broadwing Communications, LLC; and John Does 1 through 50 (CLEC's whose true names are currently unknown) for rate discrimination in connection with the provision of intrastate switched access services in alleged violation of Sections 364.08 and 364.10, F.S.

Dear Ms. Cole:

Enclosed for filing in the above matter is Verizon Access's Notice of Service of Objections and Responses to Staff's First Set of Interrogatories (Nos. 1-9). Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please call me at 678-259-1657.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

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Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Amended Complaint of Qwest Communications Company, LLC, Against MCImetro Transmission Services LLC (d/b/a Verizon Access Transmission Services); XO Communications Services, Inc.; tw telecom of florida, l.p.; Granite Telecommunications, LLC; Cox Florida Telcom, L.P.; Broadwing Communications, LLC; Access Point, Inc.; Birch Communications, Inc.; Budget Prepay, Inc.; Bullseve Telecom, Inc.; Deltacom, Inc.; Ernest Communications, Inc.; Flatel, Inc.; Lightyear Network Solutions, LLC; Navigator **Telecommunications**, LLC; Paetec Communications, Inc.; STS Telecom, LLC; US LEC of Florida, LLC; Windstream Nuvox, Inc.; and John Does 1 through 50, For unlawful discrimination

Docket No. 090538-TP

Filed: December 12, 2011

NOTICE OF SERVICE OF VERIZON ACCESS'S OBJECTIONS AND RESPONSES TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-9)

NOTICE IS HEREBY GIVEN that MCImetro Transmission Services LLC d/b/a Verizon Access Transmission Services, by and through its undersigned counsel, has served its objections and responses to Staff's First Set of Interrogatories (Nos. 1-9) to Lee Eng Tan, Senior Attorney, Office of the General Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 by electronic mail on December 12, 2011.

A copy of this Notice was sent via electronic mail on December 12, 2011 to the Office of Commission Clerk at the Commission. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

08950 DEC 14 =

Respectfully submitted on December 12, 2011.

By: <u>s/ Dulaney L. O'Roark III</u> P. O. Box 110, MC FLTP0007 Tampa, Florida 33601-0110 Phone: (678) 259-1657 Fax: (678) 259-5326 Email: <u>de.oroark@verizon.com</u>

Attorney for Verizon

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail on December 12, 2011 to the following:

> Theresa Tan, Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Itan@psc.state.fl.us

Broadwing Communications, LLC Marsha E. Rule Rutledge, Ecenia & Purnell, P.A. 119 South Monroe Street, Suite 202 Tallahassee, FL 32301 <u>marsha@reuphlaw.com</u>

CenturyLink Susan S. Masterton 315 S. Calhoun Street, Suite 500 Tallahassee, FL 32301 susan.masterton@centurylink.com

Granite Communications, LLC BullsEye Telecom, Inc. Andrew M. Klein Allen C. Zoracki Klein Law Group, PLLC 1250 Connecticut Avenue, NW, Suite 200 Washington, DC 20036 <u>aklein@kleinlawpllc.com</u> <u>azoracki@kleinlawpllc.com</u>

> Qwest (Seattle) Adam L. Sherr 1600 7th Avenue, Room 1506 Seattle, WA 98191 Adam.Sherr@gwest.com

TW Telecom of Florida L.P. Carolyn Ridley 2078 Quail Run Drive Bowling Green, KY 42104 Carolyn.Ridley@twtelecom.com TW Telecom of Florida, L.P. XO Communications Services, Inc. Windstream NuVox, Inc. Birch Communications, Inc. DeltaCom, Inc. Matthew J. Feil Gunster Yoakley & Stewart, P.A. 215 S. Monroe Street, Suite 618 Tallahassee, FL 32301 <u>mfeil@gunster.com</u>

> STS Telecom, LLC Alan C. Gold 1501 Sunset Drive, 2nd Floor Coral Gables, FL 33143 agold@acgoldlaw.com

XO Communications Services, Inc. Jane Whang David Wright Tremain 505 Montgomery Street, Suite 800 San Francisco, CA 94111-6533 janewhang@dwt.com

Access Point, Inc. Lightyear Network Solutions, LLC Navigator Telecommunications, LLC PAETEC Communications, Inc. US LEC of Florida, LLC d/b/a PAETEC Business Services Eric J. Branfman Philip J. Macres Bingham McCuthen, LLP 2020 K Street NW Washington, DC 20006-1806 eric.branfman@bingham.com philip.macres@bingham.com

Access Point, Inc. Richard Brown Chairman-CEO 1100 Crescent Green, Suite 109 Cary, NC 27518-8105 richard.brown@accesspointinc.com Budget Prepay, Inc. General Counsel 1325 Barksdale Blvd., Suite 200 Bossier City, LA 71111

Ernest Communications, Inc. General Counsel 5275 Triangle Parkway, Suite 150 Norcross, GA 30092

Flatel, Inc. c/o Adriana Solar 2300 Palm Beach Lakes Blvd. Executive Center, Suite 100 West Palm Beach, FL 33409

Lightyear Network Solutions, Inc. John Greive VP-Regulatory Affairs & General Counsel 1901 Eastpoint Parkway Louisville, KY 40223 john.greive@lightyear.net

Navigator Telecommunications, LLC Michael McAlister General Counsel 8525 Riverwood Park Drive P. O. Box 13860 North Little Rock, AR 72113 <u>mike@navtel.com</u>

s/ Dulaney L. O'Roark III