

**Eric Fryson**

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**From:** Marsha Rule [Marsha@reuphlaw.com]  
**Sent:** Friday, February 17, 2012 4:21 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** Docket No. 090538-TP  
**Attachments:** 2012.02.17. BW NOS Discovery to QCC. pdf.pdf

**The full name, address, telephone number, and e-mail address of the person responsible for the electronic filing:**

MARSHA E. RULE  
Rutledge, Ecenia & Purnell, P. A.  
Post Office Box 551  
Tallahassee, Florida 32302-0551  
(850) 681-6788  
[marsha@reuphlaw.com](mailto:marsha@reuphlaw.com)

**The docket number and title of docket:**

Docket No. 090538-TP  
In re: Amended Complaint of Qwest Communications Company, LLC against MCImetro Access Transmission Services (d/b/a Verizon Access Transmission Services); etc., et al., for unlawful discrimination.

**The name of the party on whose behalf the document is filed:**

Broadwing Communications, LLC

**The total number of pages in the attached document: 4**

**A brief but complete description of each attached document:**

Broadwing Communications LLC's Notice of Serving its First Set of Interrogatories (Nos. 1-18, Second Set of Document Requests (Nos. 4-21), and First Requests for Admissions (Nos. 1-4) to Qwest Communications Company, LLC.

**Marsha E. Rule, Attorney**

Rutledge, Ecenia & Purnell, P.A.  
119 South Monroe St. Suite 202  
Tallahassee, FL 32301  
850.681.6788

DOCUMENT NUMBER-DATE

00939 FEB 17 2012

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Amended Complaint of Qwest Communications }  
Company, LLC against MCImetro Access Transmission } Docket No. 090538-TP  
Services (d/b/a Verizon Access Transmission }  
Services); XO Communications Services, Inc.; }  
tw telecom of florida, l.p.; Granite Telecommunications, }  
LLC; Broadwing Communications, LLC; Access }  
Point, Inc.; Birch Communications, Inc.; Budget }  
Prepay, Inc.; Bullseye Telecom, Inc.; DeltaCom, Inc.; } FILED: Feb. 17, 2012  
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. }

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**BROADWING COMMUNICATIONS LLC'S NOTICE OF SERVING ITS  
FIRST SET OF INTERROGATORIES (NOS. 1-18),  
SECOND SET OF DOCUMENT REQUESTS (NOS. 4-21),  
AND FIRST REQUESTS FOR ADMISSIONS (NOS. 1-4)  
TO QWEST COMMUNICATIONS COMPANY, LLC**

Broadwing Communications LLC hereby files and serves Notice that on this day it has served the above-referenced discovery requests to Qwest Communications Company, LLC, by electronic mail and U.S. Mail, with copies to the persons and in the manner listed on the certificate of service below.

Respectfully submitted this 17<sup>th</sup> day of February, 2012.

*/s/ Marsha E. Rule*

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Marsha E. Rule  
Florida Bar No. 0302066  
Rutledge, Ecenia & Purnell, P.A.  
119 South Monroe Street, Suite 202  
Tallahassee, Florida 32301  
Phone (850) 681-6788  
FAX (850) 681-6515  
marsha@reuphlaw.com

Gregory Diamond, Esq.  
Broadwing Communications, LLC  
1505 5<sup>th</sup> Avenue  
Suite 501  
Seattle, WA 98110  
[greg.diamond@level3.com](mailto:greg.diamond@level3.com)

*Attorneys for Broadwing  
Communications, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by email (where indicated below) or U.S. Mail this 17<sup>th</sup> day of February, 2012.

Lee Eng Tan Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <a href="mailto:ltan@psc.state.fl.us">ltan@psc.state.fl.us</a>	Eric J. Branfman/Philip J. Macres Bingham Law Firm 2020 K Street, NW Washington, DC 20006 <a href="mailto:eric.branfman@bingham.com">eric.branfman@bingham.com</a> <a href="mailto:Philip.macres@bingham.com">Philip.macres@bingham.com</a>
Mr. Chris Bunce Birch Communications, Inc. 2300 Main Street, Suite 600 Kansas City, MO 64108-2415 <a href="mailto:Chris.bunce@birch.com">Chris.bunce@birch.com</a>	Mr. Greg Diamond Broadwing Communications, Inc. c/o Level 3 Communications 1505 5 <sup>th</sup> Avenue, Suite 501 Seattle, WA 98110 <a href="mailto:Greg.Diamond@level3.com">Greg.Diamond@level3.com</a>
Ms. Kristin U. Shulman XO Communications 810 Jorie Blvd., Suite 200 Oak Brook, IL 60523 <a href="mailto:Kris.shulman@xo.com">Kris.shulman@xo.com</a>	Mr. David Bailey BullsEye Telecom, Inc. 25925 Telegraph Road, Suite 210 Southfield, MI 48033-2527 <a href="mailto:dbailey@bullseyetelecom.com">dbailey@bullseyetelecom.com</a>
Jane Whang Davis Wright Tremaine LLP 505 Montgomery Street, Suite 800 San Francisco, CA 94111 <a href="mailto:janewhang@dwt.com">janewhang@dwt.com</a>	Paula Foley One Communications, an Earthlink Business Company 5 Wall Street Burlington, MA 01803 <a href="mailto:pfoley@corp.earthlink.com">pfoley@corp.earthlink.com</a>

<p>Ernest Communications, Inc. 5275 Triangle Parkway, Suite 150 Norcross, GA 30092-6511</p>	<p>Flatel, Inc. Executive Center, Suite 100 2300 Palm Beach Lakes Blvd. West Palm Beach, FL 33409-3307</p>
<p>Granite Telecommunications, LLC 100 Newport Avenue Extension Quincy, MA 02171-1734 <a href="mailto:rcurrier@granitenet.com">rcurrier@granitenet.com</a></p>	<p>Andrew M. Klein/Allen C. Zoracki Klein Law Group 1250 Connecticut Ave. NW, Suite 200 Washington, DC 20036 <a href="mailto:AKlein@kleinlawPLLC.com">AKlein@kleinlawPLLC.com</a> <a href="mailto:azoracki@kleinlawpllc.com">azoracki@kleinlawpllc.com</a></p>
<p>John Greive Lightyear Network Solutions, LLC 1901 Eastpoint Parkway Louisville, KY 40223-4145 <a href="mailto:john.greive@lightyear.net">john.greive@lightyear.net</a></p>	<p>Michael McAlister Navigator Telecommunications, LLC P.O. Box 13860 North Little Rock, AR 72113-0860 <a href="mailto:mike@navtel.com">mike@navtel.com</a></p>
<p>John B. Messenger PaeTec Communications, Inc. One PaeTec Plaza 600 Willowbrook Office Park Fairport, NY 14450-4233 <a href="mailto:john.messenger@paetec.com">john.messenger@paetec.com</a></p>	<p>Richard Brown Access Point, Inc. 1100 Crescent Green, Suite 109 Cary, NC 27511 <a href="mailto:Richard.brown@accesspointinc.com">Richard.brown@accesspointinc.com</a></p>
<p>Adam L. Sherr Qwest Communications Company, LLC 1600 7th Avenue, Room 1506 Seattle, WA 98191 <a href="mailto:Adam.Sherr@centurylink.com">Adam.Sherr@centurylink.com</a></p>	<p>Susan S. Masterton Century Link 315 S. Calhoun Street, Suite 500 Tallahassee, FL 32301 <a href="mailto:susan.masterton@centurylink.com">susan.masterton@centurylink.com</a></p>
	<p>Matt Feil Gunster Law Firm 215 South Monroe, Suite 601 Tallahassee, FL 32301 <a href="mailto:mfeil@gunster.com">mfeil@gunster.com</a></p>
<p>Alan C. Gold, P.A. 1501 Sunset Drive, 2<sup>nd</sup> Floor Coral Gables, FL 33143 <a href="mailto:acgold@acgoldlaw.com">acgold@acgoldlaw.com</a></p>	<p>Ms. Carolyn Ridley tw telecom of florida l.p. 2078 Quail Run Drive Bowling Green, KY 42104 <a href="mailto:Carolyn.Ridley@twtelecom.com">Carolyn.Ridley@twtelecom.com</a></p>

<p>Brenda Merritt  Division of Regulatory Analysis  Florida Public Service Commission  2540 Shumard Oak Boulevard  Tallahassee, FL 32399  <b><u><a href="mailto:bmerritt@psc.state.fl.us">bmerritt@psc.state.fl.us</a></u></b></p>	<p>Mr. David Christian  Verizon Access Transmission Services  106 East College Avenue, Suite 710  Tallahassee, FL 32301-7721  <b><u><a href="mailto:david.christian@verizon.com">david.christian@verizon.com</a></u></b></p>
<p>Dulaney L. O'Roark III  Verizon  5055 North Point Parkway  Alpharetta, GA 30022  678-259-1657 (phone)  678-259-5326 (fax)  <b><u><a href="mailto:de.oroark@verizon.com">de.oroark@verizon.com</a></u></b></p>	<p>Ed Krachmer  Windstream NuVox, Inc.  4001 Rodney Parham Road  MS: 1170-B1F03-53A  Little Rock, AR 72212  <b><u><a href="mailto:Edward.Krachmer@windstream.com">Edward.Krachmer@windstream.com</a></u></b></p>
	<p>James White  Windstream NuVox, Inc.  4651 Salisbury Road, Suite 151  Jacksonville, FL 32256-6187  <b><u><a href="mailto:Bettye.j.willis@windstream.com">Bettye.j.willis@windstream.com</a></u></b></p>

/s/ Marsha E. Rule

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Marsha E. Rule