

Eric Fryson

From: Lacey, Kimberly A. [kimberly.lacey@bingham.com]
Sent: Thursday, March 22, 2012 9:04 PM
To: Filings@psc.state.fl.us
Cc: Macres, Philip J.
Subject: Docket No. 090538-TP - US LEC of Florida Notice of Serving Objections and Supplemental Responses to Qwest Communications Company, LLC First Set of Document Requests (No. 2(a))
Attachments: US LEC Notice of Service.pdf

Good Evening:

Attached for filing in Docket No. 090538-TP is US LEC of Florida d/b/a PaeTec Business Services' Notice of Serving Objections and Supplemental Responses to Qwest Communications Company, LLC First Set of Document Requests (No. 2(a)).

Regards,
Kim Lacey

Print Less —> Go Green

Kimberly A. Lacey
Counsel
T 202.373.6288
F 202.373.6001
kimberly.lacey@bingham.com
B I N G H A M
Bingham McCutchen LLP
2020 K Street NW
Washington, DC 20006-1806

Confidentiality Notice: The information in this e-mail (including attachments, if any) is considered confidential and is intended only for the recipient(s) listed above. Any review, use, disclosure, distribution or copying of this e-mail is prohibited except by or on behalf of the intended recipient. If you have received this email in error, please notify me immediately by reply email, delete this email, and do not disclose its contents to anyone.

Bingham McCutchen LLP Circular 230 Notice: To ensure compliance with IRS requirements, we inform you that any U.S. federal tax advice contained in this communication is not intended or written to be used, and cannot be used by any taxpayer, for the purpose of avoiding any federal tax penalties. Any legal advice expressed in this message is being delivered to you solely for your use in connection with the matters addressed herein and may not be relied upon by any other person or entity or used for any other purpose without our prior written consent.

DOCUMENT NUMBER-DATE

01727 MAR 23 09

3/23/2012

FPSC-COMMISSION CLERK

Philip J. Macres
Phone: 202.373.6000
Fax: 202.373.6001
philip.macres@bingham.com

March 22, 2012

VIA ELECTRONIC FILING

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

Re: Docket No. 090538-TP - Amended Complaint of QWEST COMMUNICATIONS COMPANY, LLC, Against MCIMETRO ACCESS TRANSMISSION SERVICES, LLC (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., 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.

Dear Ms. Cole:

Enclosed is US LEC of Florida, LLC d/b/a PaeTec Business Services' Notice of Serving Objections and Supplemental Responses to Qwest Communications Company, LLC's First Set of Document Requests (No. 2(a)), submitted by electronic mail in the above-referenced docket.

Sincerely yours,

/s/ Philip J. Macres
Philip J. Macres

Enclosures

- Boston
- Hartford
- Hong Kong
- London
- Los Angeles
- New York
- Orange County
- San Francisco
- Santa Monica
- Silicon Valley
- Tokyo
- Walnut Creek
- Washington

Bingham McCutchen LLP
2020 K Street NW
Washington, DC
20006-1806

T 202.373.6000
F 202.373.6001
bingham.com

DOCUMENT NUMBER-DATE
01727 MAR 23 09
FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF FLORIDA

Amended Complaint of QWEST
COMMUNICATIONS COMPANY, LLC, Against
MCIMETRO ACCESS TRANSMISSION
SERVICES, LLC (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., 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: March 22, 2012

**US LEC OF FLORIDA, LLC D/B/A PAETEC BUSINESS SERVICES' NOTICE OF
SERVING OBJECTIONS AND SUPPLEMENTAL RESPONSES TO QWEST
COMMUNICATIONS COMPANY, LLC'S FIRST SET OF DOCUMENT REQUESTS
(NO. 2(a))**

US LEC of Florida, LLC d/b/a PaeTec Business Services ("US LEC"), by and through its undersigned counsel, hereby gives notice that it has served its Objections and Supplemental Responses to Qwest Communications Company, LLC's First Set of Document Requests (No. 2(a)) upon the persons and in the manner indicated in the certificate of service below.

This notice is respectfully submitted by electronic mail the 22nd day of March, 2012.

/s/ Philip J. Macres

Eric J. Branfman, Esq. (not admitted in Florida) (*)
Philip J. Macres, Esq., Fla. Bar No. 137900
Bingham McCutchen LLP
2020 K Street NW
Washington, DC 20006-1806

Tel.: (202) 373-6000
Fax: (202) 373-6001
E-mail: eric.branfman@bingham.com
E-mail: philip.macres@bingham.com

*Counsel for US LEC of Florida, LLC d/b/a PaeTec
Business Services*

(* Pursuant to Order No. PSC-10-0691-FOF-OT in
Docket No. 100008-OT issued on November 18,
2010, Eric J. Branfman has been designated as a
qualified representative for the above-referenced
parties in this proceeding.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by email, and/or U.S. Mail this 22nd day of March, 2012.

Lee Eng Tan Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 ltan@psc.state.fl.us	Matthew J. Feil Gunster, Yoakley & Stewart, P.A. 215 S. Monroe Street, Suite 601 Tallahassee, Florida 32301 mfeil@gunster.com
Mr. Chris Bunce Birch Communications, Inc. 2300 Main Street, Suite 600 Kansas City, MO 64108-2415 Chris.bunce@birch.com	Mr. Greg Diamond Broadwing Communications, Inc. c/o Level 3 Communications 1025 Eldorado Boulevard Broomfield, CO 80021-8869 Greg.Diamond@level3.com
Budget PrePay, Inc. 1325 Barksdale Boulevard Suite 200 Bossier City, LA 71111-4600	Mr. David Bailey BullsEye Telecom, Inc. 25925 Telegraph Road, Suite 210 Southfield, MI 48033-2527 dbailey@bullseyetelecom.com
Jane Whang Davis Wright Tremaine LLP 505 Montgomery Street, Suite 800 San Francisco, CA 94111 janewhang@dwt.com	Paula Foley Earthlink Business 5 Wall Street Burlington, MA 01803 pfoley@corp.earthlink.com
Ernest Communications, Inc. 5275 Triangle Parkway, Suite 150 Norcross, GA 30092-6511 lhaag@ernestgroup.com	Flatel, Inc. c/o Adriana Solar Executive Center, Suite 100 2300 Palm Beach Lakes Blvd. West Palm Beach, FL 33409-3307 asolar@flatel.net
Granite Telecommunications, LLC 100 Newport Avenue Extension Quincy, MA 02171-1734 rcurrier@granitenet.com	Andrew M. Klein/Allen C. Zoracki Klein Law Group 1250 Connecticut Ave. NW, Suite 200 Washington, DC 20036 AKlein@kleinlawPLLC.com azoracki@kleinlawpllc.com

<p>John Greive Lightyear Network Solutions, LLC 1901 Eastpoint Parkway Louisville, KY 40223-4145 john.greive@lightyear.net</p>	<p>Michael McAlister Navigator Telecommunications, LLC P.O. Box 13860 North Little Rock, AR 72113-0860 mike@navtel.com</p>
<p>Mr. John Ivanuska XO Communications Services, Inc. 10940 Parallel Parkway, Suite K - #353 Kansas City, KS 66109-4515 john.ivanuska@xo.com Kris.Shulman@xo.com</p>	<p>Richard Brown Access Point, Inc. 1100 Crescent Green, Suite 109 Cary, NC 27511 Richard.brown@accesspointinc.com</p>
<p>Adam L. Sherr Qwest Communications Company, LLC 1600 7th Avenue, Room 1506 Seattle, WA 98191 Adam.Sherr@qwest.com</p>	<p>Marsha Rule Rutledge Law Firm Post Office Box 551 Tallahassee, FL 32302 marsha@reuphlaw.com</p>
<p>Susan S. Masterton CenturyLink 315 S. Calhoun Street, Suite 500 Tallahassee, FL 32301 Susan.masterton@centurylink.com</p>	<p>Ms. Carolyn Ridley tw telecom of florida l.p. 2078 Quail Run Drive Bowling Green, KY 42104 Carolyn.Ridley@twtelecom.com</p>
<p>Alan C. Gold, P.A. 1501 Sunset Drive, 2nd Floor Coral Gables, FL 33143 acgold@acgoldlaw.com</p>	<p>Ms. Rebecca A. Edmonston Verizon Access Transmission Services 106 East College Avenue, Suite 710 Tallahassee, FL 32301-7721 Rebecca.edmonston@verizon</p>
<p>Brenda Merritt Division of Regulatory Analysis Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 bmerritt@psc.state.fl.us</p>	<p>Ed Krachmer PAETEC Communications, Inc.; US LEC of Florida, LLC d/b/a PAETEC Business Services and Windstream NuVox, Inc 4001 Rodney Parham Road MS: 1170-B1F03-53A Little Rock, AR 72212 Edward.Krachmer@windstream.com</p>

Dulaney L. O'Roark III Verizon Florida LLC Six Concourse Parkway, NE, Suite 800 Atlanta, GA 30328 de.oroark@verizon.com	Ms. Bettye Willis PAETEC Communications, Inc.; US LEC of Florida, LLC d/b/a PAETEC Business Services and Windstream NuVox, Inc. 13560 Morris Rd., Suite 2500 Milton, GA 30004 Bettye.j.willis@windstream.com
	Howard Adams Pennington Law Firm P.O. Box 10095 Tallahassee, FL 32302 gene@penningtonlaw.com

By: /s/ Kimberly A. Lacey
 Kimberly A. Lacey