Dulaney L. O'Roark III Vice President-General Counsel, Southeast Region Legal Department



5055 North Point Parkway Alpharetta, Georgia 30022 Phone 678-259-1449 Fax 678-259-1589 de.oroark@verizon.com

March 16, 2009 - VIA ELECTRONIC MAIL

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

Re: Docket No. 080278-TL Joint Petition for show cause proceedings against Verizon Florida LLC for apparent violation of Rule 25-4.070, F.A.C., Customer Trouble Reports, and impose fines, by the Office of the Attorney General, Citizens of the State of Florida, and AARP

Dear Ms. Cole:

Enclosed for filing in the above matter is Verizon Florida LLC's Notice of Service of Objections to Citizens' Second Request for Production of Documents (No. 15). Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 678-259-1449.

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: Joint Petition for show cause proceedings ) against Verizon Florida LLC for apparent violation of ) Rule 25-4.070, F.A.C., Customer Trouble Reports, ) and impose fines, by the Office of the Attorney ) General, Citizens of the State of Florida, and AARP ) Docket No. 080278-TL Filed: March 16, 2009

## NOTICE OF SERVICE OF VERIZON FLORIDA LLC'S OBJECTIONS TO CITIZENS' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 15)

NOTICE IS HEREBY GIVEN that Verizon Florida LLC, by and through its

undersigned counsel, has served its objections to Citizens' Second Request for Production

of Documents (No. 15) via electronic mail on March 16, 2009 to Charles Beck, Deputy

Public Counsel, Office of Public Counsel, c/o The Florida Legislature, 111 West Madison

Street, Room 812, Tallahassee, FL 32399-1400.

A copy of this Notice was also sent via electronic mail on March 16, 2009 to the

Office of the Commission Clerk. Further service on other parties of record is as set forth on

the Certificate of Service, appended hereto.

Respectfully submitted on March 16, 2009.

By: <u>s/ Dulaney L. O'Roark III</u> Dulaney L. O'Roark III 5055 North Point Parkway Alpharetta, Georgia 30022 Phone: (678) 259-1449 Fax: (678) 259-1589 Email: <u>de.oroark@verizon.com</u>

Attorney for Verizon Florida LLC

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail on March 16, 2009 to:

Adam Teitzman, Staff Counsel Lee Eng Tan, Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <u>ateitzma@psc.state.fl.us</u> <u>Itan@psc.state.fl.us</u>

Bill McCollum/Cecilia Bradley Office of Attorney General The Capitol – PL01 Tallahassee, FL 32399-1050 <u>cecilia.bradley@myfloridalegal.com</u>

J. R. Kelly Patricia Christensen Charles Beck Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 <u>kelly.jr@leg.state.fl.us</u> <u>beck.charles@leg.state.fl.us</u>

> Michael B. Twomey AARP P. O. Box 5256 Tallahassee, FL 32314-5256 <u>miketwomey@talstar.com</u>

> > s/ Dulaney L. O'Roark III