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



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April 23, 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 and Responses to Staff's First Request for Production of Documents (Nos. 1-11), First Set of Interrogatories (Nos. 1-29), and First Request for Admissions (Nos. 1-2). 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: April 23, 2009

## NOTICE OF SERVICE OF VERIZON FLORIDA LLC'S OBJECTIONS AND RESPONSES TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11), FIRST SET OF INTERROGATORIES (NOS. 1-29), AND <u>FIRST REQUEST FOR ADMISSIONS (NOS. 1-2)</u>

NOTICE IS HEREBY GIVEN that Verizon Florida LLC, by and through its undersigned counsel, has served its objections and responses to Staff's First Request for Production of Documents (Nos. 1-11), First Set of Interrogatories (Nos. 1-29), and First Request for Admissions (Nos. 1-2) via electronic mail on April 23, 2009 to Lee Eng Tan, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850.

A copy of this Notice was also sent via electronic mail on April 23, 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 April 23, 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 April 23, 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