

In re: Discovery related to study on fair and reasonable rates and on relationships among costs and charges associated with certain telecommunications services provided by local exchange companies (LECs), as required by Chapter 98-277, Laws of Florida

DOCKET NO. 980733-TL

FILED: SEPTEMBER 24, 1998

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of Staff's First Set of Interrogatories (Nos. 1 through 7) have been served VIA U.S. MAIL, to David B. Erwin, Esquire, Attorney-at-Law, 127 Riversink Road Crawfordville, Florida 32327, on behalf of ITS Telecommunications Systems, Inc., this 24th day of September, 1998, and that a true and correct copy thereof has been furnished by U.S. Mail to the following:

Jack Shreve, Esquire
Charles Beck, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Rm. 812
Tallahassee, FL 32399-1400

Earl Poucher
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street,
Rm. 812
Tallahassee, FL 32399-1400

Michael Gross, Asst. Atty. General
Office of the Attorney General
PL-01 The Capitol
Tallahassee, FL 32399-1050

Ken Hoffman, Esquire
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302-0551

- NCK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE

~~10576~~ SEP 24 8

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
DOCKET NO. 980733-TL
PAGE 2

John Ellis, Esquire
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302-0551

Rhonda Merritt, Asst., Vice President
AT&T
101 N. Monroe Street
Suite 700
Tallahassee, FL 32301

Moncia Barone, Esquire
Sprint
3100 Cumberland Circle
Atlanta, GA 30339

David B. Erwin, Esquire
Attorney-at-Law
127 Riversink Road
Crawfordville, Florida 32327

Norman Horton, Esquire
Messer, Caparello & Self, P.A.
P.O. Box 1876
Tallahassee, FL 32302

Joe McGlothlin, Esquire
McWhirter, Reeves, McGlothlin
Davidson, Rief & Bakas, P.A.
117 S. Gadsden Street
Tallahassee, FL 32301

Donna Canzano, Esquire
Wiggins & Villacorta
P.O. Drawer 1657
Tallahassee, FL 32302

Tracy Hatch, Esquire
AT&T
101 N. Monroe Street
Suite 700
Tallahassee, FL 32301

Richard D. Melson, Esquire
Hopping, Green, Sams & Smith,
P.A.
P.O. Box 6526
Tallahassee, FL 32314

Charles Rehwinkel, Esquire
Sprint-Florida
1313 Blairstone Road
MC FLTLH00107
Tallahassee, FL 32301

Nancy Sims, Esquire
BellSouth Telecommunications,
Inc.
150 S. Monroe Street
Suite 400
Tallahassee, FL 32301-1556

Floyd Self, Esquire
Messer, Caparello & Self, P.A.
P.O. Box 1876
Tallahassee, FL 32302

Patrick Wiggins, Esquire
Wiggins & Villacorta
P.O. Drawer 1657
Tallahassee, FL 32302

Kimberley Caswell, Esquire
GTE Florida Incorporated
P.O. Box 110, FLTC0007
Tampa, FL 33601

CERTIFICATE OF SERVICE
DOCKET NO. 980733-TL
PAGE 3

John Fons, Esquire
Ausley & McMullen
227 S. Calhoun Street
Tallahassee, FL 32301

Jeff Wahlen, Esquire
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301

David Swafford
c/o Pennington, Moore, Wilkinson,
& Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302

Barbara Auger, Esquire
Marc Dunbar, Esquire
Pennington, Moore, Wilkinson,
& Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302

Mr. Tom McCabe
TDS Telecom
P.O. Box 189
Quincy, FL 32353-0189

Mr. Ed Paschall
AARP
1923 Atapha Nene
Tallahassee, FL 32301-5850

Mr. Ben Ochshor
Florida Legal Services
2121 Delta Boulevard
Tallahassee, FL 32303

Laura Gallagher
Florida Cable Telecommunications
Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

Ms. Kelly Goodnight
Frontier Communications
180 S. Clinton Avenue
Rochester, NY 14646

Mr. Bill Thomas
GTC, Inc.
P.O. Box 220
Port St. Joe, FL 32457

Mr. Mike Lacour
GTC Inc.
P.O. Box 220
Port St. Joe, FL 32457

Mr. Mark Ellmer
GTC Inc.
P.O. Box 220
Port St. Joe, FL 32457

Ms. Susan Langston
FTIA
P.O. Box 1776
Tallahassee, FL 32302-1776

Mr. Steven Brown
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309

CERTIFICATE OF SERVICE
DOCKET NO. 980733-TL
PAGE 4

Mr. Bill Huttenhower
Vista-United
P.O. Box 10180
Lake Buena Vista, FL 32830

Ms. Harriet Eudy
ALLTEL
206 White Avenue
Live Oak, FL 32060

Mr. Jim McGinn
ITS Telecommunications Systems, Inc.
P.O. Box 277
Indiantown, FL 34956

Ms. Lynne G. Brewer
Northeast Florida Telephone
Company
P.O. Box 485
Macclenny, FL 32063

Ms. Julie S. Myers
Smith, Bryan & Myers
311 E. Park Avenue
Tallahassee, FL 32301

Patricia Greene, Esquire
Holland & Knight
315 S. Calhoun Street
Suite 600
Tallahassee, FL 32301

Mr. Michael Twomey, Esquire
Route 28 Box 1264
Tallahassee, FL 32310

Richard L. Spears
Legislative Chairman
Community Assoc. Institute
Florida Legislative Alliance
9132 Ridge Pine Trail
Orlando, FL 32819

Mr. John Guthrie, Staff Director
Senate Committee on Regulated
Industries
418 Senate Office Building
Tallahassee, FL 32399-1300

Ms. Susan Masterson
Senate Committee on Regulated
Industries
418 Senate Office Building
Tallahassee, FL 32399-1100

Mr. Booter Imhof
Legislative Research Director
House Committee on Utilities &
Communications
428 House Office Building
Tallahassee, FL 32399-1300

Mr. Charlie Murphy
House Committee on Utilities &
Communications
428 House Office Building
Tallahassee, FL
32399-1300

CERTIFICATE OF SERVICE
DOCKET NO. 980733-TL
PAGE 5

Mr. David Daniel
House Democratic Office
316, The Capitol
402 S. Monroe Street
Tallahassee, FL 32399-1300

Thomas K. Bond, Esquire
MCI Metro Access
780 Johnson Ferry Rd.
Suite 700
Atlanta, GA 30342

Mr. Alexis Muellner
Associate Editor
South Florida Business Journal
1320 S. Dixie Highway
Coral Gables, FL 33146

Vista-United Telecommunications
Ms. Lynn B. Hall
P.O. Box 10180
Lake Buena Vista, FL 32830-0180

Mr. Frankie Callen
Vice President of Governmental Affairs
The Greater Orlando Assoc. Of REALTORS
P.O. Box 1853
Tallahassee, FL 32302-1853

Debra K. Mink, R.P.A., President
Legislative Chair, BOMA Florida
Mink & Mink, Inc.
Sunnyvale Building
3081 East Commercial Boulevard
Fort Lauderdale, FL 33308

Gene Adams
P.A. Florida Association of Realtors
P.O. Box 1853
Tallahassee, FL 32302-1853

John L. Brewerton, III,
250 N. Orange Avenue
Suite 1700
Orlando, FL 32801

Chris Keena
Property Operations Manager
Compass Management & Leasing, Inc.
1801 Hermitage Boulevard
Suite 130
Tallahassee, FL 32308

Vista-United
Telecommunications
Bill Huttenhower
P.O. Box 10180
Lake Buena Vista, FL 32830-0180

ALLTEL Florida, Inc.
Mr. Richard H. Brashear
206 White Avenue, S.E.
Live Oak, FL 32060-3343

Monte Belote
6801 Seaview Way
Tampa, FL 33615

CERTIFICATE OF SERVICE
DOCKET NO. 980733-TL
PAGE 6

Ervin Law Firm
Everett Boyd, Esquire
P.O. Drawer 1170
Tallahassee, FL 32302

Florida Public
Telecommunications
Association
Angela Green
125 S. Gadsden Street
Suite 200
Tallahassee, FL 32301-1525

Frontier Communications of the
South, Inc.
Ms. Laurie A. Maffett, Mgr/Reg Matters
Frontier Telephone Group
180 South Clinton Avenue
Rochester, NY 14646-0400

ITS Telecommunications Systems,
Inc.
Mr. Robert M. Post, Jr.
P.O. Box 277
Indiantown, FL 34956-0277

Intermedia Communications
Of Florida, Inc.
Mr. Steve Brown
Queen Palm Drive
Tampa, FL 33619-1309

Sprint-Florida, Incorporated
Mr. F. Ben Poag
P.O. Box 2214 (MC FLTLH00107)
Tallahassee, FL 32316-2214

TDS Telecom/Quincy Telephone
Mr. Thomas M. McCabe
P.O. Box 189
Quincy, FL 32353-0189



BETH KEATING
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(850) 413-6199