

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MediaOne Florida Telecommunications, Inc. for arbitration of an interconnection agreement with BellSouth Telecommunications, Inc. pursuant to Section 252(b) of the Telecommunications Act of 1996.

DOCKET NO. 990149-TP

DATED: MARCH 15, 1999

MEDIAONE FLORIDA TELECOMMUNICATIONS, INC.'S NOTICE OF SERVICE OF RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

NOTICE IS HEREBY GIVEN, that MediaOne Telecommunications, Inc.'s response to Staff's First Request for Production of Documents has been hand delivered to: J. Phillip Carver, Esq., BellSouth Telecommunications, Inc., 150 South Monroe Street, Room 400, Tallahassee, FL and Beth Keating, Esq., Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida.

The original and one copy of this Notice of Service has been hand delivered to the Director, Division of Records and Reporting at the florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399.

Respectfully submitted this 16th day of April, 1999.

William B. Graham, Esq. Fla. Bar No. 359068 Graham & Moody, P.A. 101 N. Gadsden Street Tallahassee, FL 32301 (850) 222-6656

DOCUMENT NUMBER-DATE

04877 APR 16 8

GRAHAM & MOODY

ATTORNEYS AT LAW

WILLIAM B. GRAHAM W. DOUGLAS MOODY, JR. RICHARD N. SOX, JR. CERTAIN ATTORNEYS ALSO ADMITTED IN GEORGIA, AND TEXAS ROBERT F. REYES*
GOVERNMENTAL CONSULTANT
'NOT A MEMBER OF THE FLORIDA BAR

April 16, 1999

VIA HAND DELIVERY

Ms. Blanco Bayo, Director Division of Records and Reporting Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: MediaOne Florida Telecommunications, Inc.

Dear Ms. Bayo:

AFA

Enclosed for filing on behalf of MediaOne Florida Telecommunications, Inc., are the following documents:

Original and one copy of MediaOne's responses to Staff's First Set of Interrogatories and First Request for Production.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "Filed" and returning the same to me.

I thank you very much for your assistance in this matter.

Willed A. Dialam

William B. Graham

APP WBG/ktc RECEIVED & FILED CAF CMU Encls. CTR Susan Keesen FPSC-BUREAU OF RECORDS cc: EAG Dick Karre **LEG** MAS Jim Campbell OPC RRR SEC NUMBER-DATE DOCUMENT NUMBER-DATE WAW

101 NORTH GADSIAN C RETT 8 TAPPHAGE FLORIDA 32301 (850) 222-6656 • Fax: (850) 222-7678 E-mail: graham@moody@nettally.com 0 4 8 7 7 APR 16 8