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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Complaint of Global NAPs, Inc., Against	)	35. <b>7</b>	
BellSouth Telecommunications, Inc., for	)	R R	7
Enforcement of Section VI(B) of its Interconnection	)	Docket No. 991267-TP	-8
Agreement with BellSouth Telecommunications, Inc.,	)	Filed December 17, 1999	8
and Request for Relief.	)	0.	( )
	)		

## NOTICE OF SERVICE OF GLOBAL NAPS, INC.'S FIRST SET OF INTERROGATORIES, FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND FIRST REQUEST FOR ADMISSIONS TO BELLSOUTH TELECOMMUNICATIONS, INC.

GLOBAL NAPS, INC., by and through its undersigned attorneys, hereby gives notice that on this 17<sup>th</sup> day of December, 1999, it served its First Set of Interrogatories, First Request for Production of Documents and First Request for Admissions on BellSouth Telecommunications,

Inc.

AFA

CAF

CMIJ CTR EAG

LEG

MAS

OPC

WAW

Jon C. Moyle, Jr., Fla. Bar No. 727016 Cathy M. Sellers, Fla. Bar No. 0784958 Moyle Flanigan Katz Kolins Raymond & Sheehan, P.A. 118 North Gadsden Street Tallahassee, FL 32301 (850) 681-3828

William J. Rooney, General Counsel John O. Postl, Assistant General Counsel Global Naps, Inc. 10 Merrymount Road Quincy, MA 02169 (617) 507-5111

Christopher W. Savage Cole, Raywid, & Braverman, L.L.P. 1919 Pennsylvania Avenue, N.W. Washington, D.C. 20006 (202) 828-9811

DOCUMENT NI MPER-DATE

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished this 17th day of December, 1999 by hand delivery to Nancy White, General Counsel, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, FL 32301, and by facsimile and U.S. Mail to Michael P. Goggin, BellSouth Telecommunications, Inc., Museum Tower, Suite 1910, 150 West Flagler Street, Miami, FL 33130, R. Douglas Lackey and E. Earl Edenfield, Ir., BellSouth Telecommunications, Inc., BellSouth Center, Suite 4300, 675 W. Peachtree Street, N.E., Atlanta, GA 30375, Nanette Edwards, Regulatory Attorney, ITC DeltaCom, 700 Boulevard South, Suite 101, Huntsville, AL 35802, and Beth Keating, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399.

Jon C. Moyle, Jr.