

March 28, 2002

via Overnight Mail

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Ms. Blanca Bayó, Director Division of the Commission Clerk & Administrative Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket No. 020119 – Petition for Expedited Review and Cancellation Of BellSouth Telecommunications, Inc.'s Key Customer Promotional Tariffs and For an Investigation Of BellSouth's Promotional Pricing And Marketing Practices by Florida Digital Network, Inc.

Dear Ms. Bayó,

Please find enclosed for filing in the above docket an original and seven (7) copies of the following: Florida Digital Network, Inc.'s Notice of Serving Responses to Staff's Second Set of Interrogatories (Nos. 5 - 11) and First Set of Request for Production of Documents (No. 1).

If you have any questions regarding the enclosed, please call me at 407-835-0460.

Sincerely,

LOCAL

Matthew Feil

Mátthéw Feil Florida Digital Network General Counsel

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390 North Orange Ave - Suite 2000 - Orlando, Florida 32801 407.835.0300 - Fax 407.835.0309 - www.fdn.com D 3 5 9 9 MAR 29 8

FPSC-COMMISSION CLERK



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Petition for Expedited Review and Cancellation of BellSouth Telecommunications, Inc.'s Key Customer Promotional Tariffs and For an Investigation Of BellSouth's Promotional Pricing And Marketing Practices by Florida Digital Network, Inc

Docket No. 020119-TP

<u>FLORIDA DIGITAL NETWORK, INC.'S NOTICE OF SERVING RESPONSES TO</u> <u>STAFF'S SECOND SET OF INTERROGATORIES (NOS. 5 – 11) AND FIRST SET OF</u> <u>REQUESTS FOR PRODUCTION OF DOCUMENTS (NO. 1)</u>

Florida Digital Network, Inc., ("FDN" or "Florida Digital") hereby provides notice that it has served its responses to the Florida Public Service Commission Staff's Second Set of Interrogatories, numbered 5 through 11, and First Set of Requests for Production of Documents (No. 1) to staff and the parties to this docket.

Respectfully submitted, this *A*day of March 2002.

Matthew Feil Florida Digital Network, Inc 390 North Orange Ave. Suite 2000 Orlando, FL 32801 407-835-0460 mfeil@floridadigital.net

DOCUMENT NUMBER DATE

03599 MAR 298

Certificate of Service

I hereby certify that a copy of the foregoing and the referenced discovery responses were served on the following by e-mail (where an email address is identified below) and by U.S. Mail this $\frac{7}{2}$ day of $\frac{1}{2}$ day of $\frac{1}{2}$ 2002.

Nancy White/James Meza/Patrick Turner c/o Ms. Nancy Sims BellSouth Telecommunications, Inc. 150 S. Monroe Street Suite 400 Tallahassee, FL 32301 Nancy.sims@bellsouth.com

Pennington Law Firm Karen M. Camechis P.O. Box 10095 Tallahassee, FL 32302-2095 Karen@penningtonlawfirm.com

Time Warner Telecom of Florida, L.P. C/o Carolyn Marek 233 Bramerton Court Franklin, TN 37069-4002 Carolyn.marek@twtelecom.com

XO Florida, Inc. Ms. Dana Shaffer 105 Molloy Street, Suite 300 Nashville, TN 37201-2315 dshaffer@xo.com Linda H. Dodson/Felicia Banks Staff Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <u>ldodson@psc.state.fl.us</u> <u>fbanks@psc.state.fl.us</u>

Rutledge Law Firm Ken Hoffman/Martin McDonnel/M. Rule P.O. Box 551 Tallahassee, FL 32302-0551 <u>ken@reuphlaw.com</u>

US LEC of Florida, Inc. Morrocroft III 6801 Morrison Blvd. Charlotte, NC 28211-3599

Matthew Feil Florida Digital Network, Inc 390 North Orange Ave. Suite 2000 Orlando, FL 32801 407-835-0460 mfeil@floridadigital.net