## ORIGINAL



Susan S. Masterton Attorney

Law/External Affairs

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March 14, 2003

Ms. Blanca S. Bayó, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket No. 981834-TP & 990321-TP

Dear Ms. Bayó:

Enclosed for Filing on behalf of Sprint are the original and one copy of

- 1. Sprint's Notice of Service of Responses to AT&T Communications of the Southern States, LLC's First Request for Production of Documents (No. 1-22) and First Request for First Set of Interrogatories (No. 1-4)
- 2. Sprint's Claim of Confidentiality.

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Copies are being served on the parties in this docket pursuant to the attached Certificate of Service.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to the courier. If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Susan S. Masterton

Enclosure

AUS

CAF CMP

COM CTR ECR

RECEIVED & FILED

DOCUMENT NUMBER - DATE

02512 MAR 148

02513 MAR 148

FPSC-COMMISSION CLERK FPSC-COMMISSION CLERK

#### CERTIFICATE OF SERVICE DOCKET NO. 981834-TP & 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or Hand Delivery\* this 14th day of March, 2003 to the following:

Wayne Knight, Esq.\*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

Nancy B. White c/o Nancy H. Sims BellSouth Telecommunications, Inc. 150 S. Monroe Street Suite 400 Tallahassee, Florida 32301-1556

Alltel Communications Services, Inc. Bettye Willis
One Allied Drive
Little Rock, AR 72203-2177

Hopping Law Firm Rick Melson Post Office Box 6526 Tallahassee, Florida 32314

Pennington Law Firm
Peter Dunbar/Marc W. Dunbar
Post Office Box 1009
Tallahassee, Florida 32302

Florida Cable Telecommunications Association, Incorporated Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303

Time Warner Telecom Carolyn Marek 233 Bramerton Court Franklin, TN 37069 FCCA c/o McWhirter Law Firm Vicki Kaufman 117 S. Gadsden Street Tallahassee, Florida 32301

Ausley Law Firm
Jeff Wahlen
Post Office Box 391
Tallahassee, Florida 32302

MCI WorldCom Communications, Inc. Donna McNulty 1203 Governors Square Blvd. Suite 201 Tallahassee, Florida 32301-2960

Messer Law Firm Floyd Self/Norman Horton Post Office Box 1876 Tallahassee, Florida 32302

MediaOne Florida Telecommunications, Inc. c/o Laura L. Gallagher, P.A. 101 E. College Ave., Suite 302 Tallahassee, Florida 32301

AT&T Communications of the \*
Southern States, Inc.
Tracy W. Hatch
215 South Monroe Street
Tallahassee, Florida 32301

Katz, Kutter Law Firm Charles Pellegrini/Patrick Wiggins 12<sup>th</sup> Floor 106 East College Avenue Tallahassee, Florida 32301 Supra Telecommunications & Information Systems, Inc. Mark E. Buechele 2620 S.W. 27<sup>th</sup> Avenue Miami, FL 33133

Verizon-Florida, Incorporated Michelle Robinson P.O. Box 110, FLTC0007 Tampa, FL 33601-0110

ITC^DeltaCom Communications, Inc. Nanette Edwards Messer, Caparello & Self Post Office Box 1876 Tallahassee, Florida 32302-1876

Network Telephone Corporation Brent E. McMahan 815 South Palafox Street Pensacola, FL 32501-5937

KMC Telecom, Inc. Mr. John D. McLaughlin, Jr. 1755 North Brown Road Lawrenceville, GA 30043-8119

Florida Digital Network, Inc. Matthew Feil, Esq. 390 North Orange Ave., Suite 2000 Orlando, FL 32801

Susan S. Masterton

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Competitive	) Docket No. 981834-TP
Carriers for Commission action to	)
support local competition in BellSouth	)
Telecommunications, Inc.'s service	)
territory.	<u>)</u>
Petition of ACI Corp. d/b/a Accelerated	) .
Connections, Inc. for generic investigation to	) Docket No. 990321-TP
Ensure that BellSouth Telecommunications, Inc.,	)
Sprint-Florida, Incorporated, and GTE	)
Florida Incorporated comply with obligation	)
to provide alternative local exchange	)
carriers with flexible, timely, and cost-efficient	)
physical collocation.	) Date: March 14, 2003
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# SPRINT'S NOTICE OF SERVICE OF RESPONSES TO AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1-22) AND FIRST SET OF INTERROGATORIES (NO. 1-4)

NOTICE IS HEREBY GIVEN that a copy of the responses of Sprint-Florida, Incorporated, hereinafter ("Sprint") to AT&T Communications of the Southern States, LLC's First Request for Production of Documents (No. 1-22) and First Set of Interrogatories (No. 1-4), which was legally propounded by, AT&T Communications of the Southern States, LLC on February 20, 2003 was submitted via e-mail on Tracy W. Hatch, Esq. at <a href="mailto:Thatch@lawfla.com">Thatch@lawfla.com</a> and Hand Delivery to Tracy W. Hatch, Esq. AT&T Communications of the Southern States, LLC's, Messer Law Firm, 215 South Monroe Street, Suite 701, Tallahassee, Florida 32302. Copies of this Notice have been served on the parties to this docket pursuant to the attached Certificate of Service.

DOCUMENT NUMBER-DATE

02512 MAR 148

FPSC-COMMISSION CLERK

### RESPECTFULLY SUBMITTED this 14th day of March, 2003.

Susan S. Masterton

P.O. Box 2214 MS: FLTLHO0107

Tallahassee, Florida 32316

850/599-1560

ATTORNEY FOR SPRINT