Richard A. Chapkis Vice President -- General Counsel, Southeast Region Legal Department



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April 8, 2005 - VIA ELECTRONIC MAIL

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

Re: Docket No. 040156-TP Petition for Arbitration of Amendment to Interconnection Agreements With Certain Competitive Local Exchange Carriers and Commercial Mobile Radio Service Providers in Florida by Verizon Florida Inc.

Dear Ms. Bayo:

Enclosed for filing are Verizon Florida Inc.'s Notices of Service of Responses to Staff's Amended Third Set of Interrogatories (Nos. 70-114) and Third Request for Production of Documents (Nos. 7-9) in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions concerning this filing, please contact me at 813-483-1256.

Sincerely,

/s/ Richard A. Chapkis

**Richard A. Chapkis** 

RAC:tas Enclosures

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Notice of Service and Responses to Staff's Amended Third Set of Interrogatories (Nos. 70-114) and Notice of Service of Responses to Staff's Third Request for Production of Documents (Nos. 7-9) in Docket No. 040156-TP were sent via U.S. mail on April 8, 2005 to the parties on the attached list.

/s/ Richard A. Chapkis

Richard A. Chapkis

Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

LecStar Telecom, Inc. Michael E. Britt 4501 Circle 75 Parkway Suite D-4200 Atlanta, GA 30339-3025

MCI WorldCom Comm./ Intermedia Comm./MCImetro Access/Metropolitan Fiber Donna C. McNulty 1203 Governors Square Blvd. Suite 201 Tallahassee, FL 32301-2960

Supra Telecommunications and Information Systems Inc. Ann H. Shelfer 1311 Executive Center Drive Suite 220 Tallahassee, FL 32301-5067

USA Telephone Inc. d/b/a CHOICE ONE Telecom 1510 NE 162<sup>nd</sup> Street North Miami Beach, FL 33162

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

Local Line America, Inc. Amy J. Topper 520 S. Main Street, Suite 2446 Akron, OH 44310-1087 ALEC, Inc. 3640 Valley Hill Road Kennesaw, GA 30152-3238

American Dial Tone Larry Wright 2323 Curlew Road, Suite 7C Dunedin, FL 34683

Director-Interconnection Services Level 3 Communications, LLC 1025 Eldorado Boulevard Broomfield, CO 80021-8869

Eric Larsen Tallahassee Telephone Exchange Inc. 1367 Mahan Drive Tallahassee, FL 32308

Kellogg Huber Law Firm A. Panner/S. Angstreich 1615 M Street, NW, Suite 400 Washington, DC 20036

Norman Horton/E. Gary Early Messer, Caparello & Self 215 S. Monroe Street Suite 701 Tallahassee, FL 32302

Mario J. Yerak, President Saluda Networks Incorporated 782 NW 42nd Avenue, Suite 210 Miami, FL 33126 Sonia Daniels AT&T 1230 Peachtree St. N.E. Suite 400 Atlanta, GA 30309

MCI WorldCom Comm. Dulaney O'Roark, III 6 Concourse Parkway Suite 600 Atlanta, GA 30328

NewSouth Comm. Corp. Keiki Hendrix Two N. Main Street Greenville, SC 29601-2719

The Ultimate Connection L.C. d/b/a DayStar Comm. 18215 Paulson Drive Port Charlotte, FL 33954

James C. Falvey Xspedius Management Co. 7125 Columbia Gateway Dr. Suite 200 Columbia, MD 21046

Competitive Carrier Group c/o Kelley Drye & Warren LLP 1200 19<sup>th</sup> Street NW, 5<sup>th</sup> Floor Washington, DC 20036

Patricia S. Lee Florida Public Svc. Comm. Div. of Comp. Markets & Enforcement 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 Sprint Comm. Company Susan Masterton P. O. Box 2214 Tallahassee, FL 32316-2214 Swidler Law Firm Russell M. Blau 3000 K Street NW, Suite 300 Washington, DC 20007-5116 Time Warner Telecom Carolyn Marek 233 Bramerton Court Franklin, TN 37069-4002

Genevieve Morelli Brett H. Freedson Kelley Drye & Warren LLP 1200 19<sup>th</sup> Street, NW Washington, DC 20036 Matthew Feil FDN Communications 2301 Lucien Way, Suite 200 Maitland, FL 32751

# **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Petition for Arbitration of Amendment to Interconnection Agreements with Certain Competitive Local Exchange Carriers and Commercial Mobile Radio Service Providers in Florida by Verizon Florida Inc. Docket No. 040156-TP Filed: April 8, 2005

### NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S RESPONSES TO STAFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 7-9)

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its responses to Staff's Third Request for Production of Documents (Nos. 7-9) via electronic mail and overnight delivery on April 8, 2005 to Lee Fordham, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850.

This Notice was sent via electronic mail on April 8, 2005 to the Director, Division of

the Commission Clerk and Administrative Services, at the Commission. Further service on

other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on April 8, 2005.

By: <u>s/ Richard A. Chapkis</u> Richard A. Chapkis 201 N. Franklin Street, FLTC0717 (33602) P. O. Box 110 (33601) Tampa, FL 33602 Tel: 813-483-1256 Fax: 813-204-8870

Attorney for Verizon Florida Inc.

# **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Petition for Arbitration of Amendment to Interconnection Agreements with Certain Competitive Local Exchange Carriers and Commercial Mobile Radio Service Providers in Florida by Verizon Florida Inc. Docket No. 040156-TP Filed: April 8, 2005

### NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S RESPONSES TO STAFF'S AMENDED THIRD SET OF INTERROGATORIES (NOS. 70-114)

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its responses to Staff's Amended Third Set of Interrogatories (Nos. 70-114) via electronic mail and overnight delivery on April 8, 2005 to Lee Fordham, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850.

This Notice was sent via electronic mail on April 8, 2005 to the Director, Division of

the Commission Clerk and Administrative Services, at the Commission. Further service on

other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on April 8, 2005.

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Attorney for Verizon Florida Inc.