Dorothy Menasco

From:

Scobie, Teresa A (TERRY) [terry.scobie@verizon.com]

Sent:

Friday, March 13, 2009 2:10 PM

To:

Filings@psc.state.fl.us

Cc:

Adam Teitzman; Cecilia Bradley; Charles Beck; David Christian; De O'Roark; Demetria Clark; Elek, Robert

(BOB); J. R. Kelly; Kampert, Deborah B (DEBBY); Lee Eng Tan; Michael Twomey

Subject:

Docket No. 080278-TL - Verizon Florida LLC's Notice of Service of Objections to Staff's First Set of

Interrogatories, First Request for Production of Documents and First Request for Admissions

Attachments: 080278 VZ FL Notice of Svc-Objections-Staff 3-13-09.pdf



The attached is submitted in Docket No. 080278-TL on behalf of Verizon Florida LLC by

Dulaney L. O'Roark III P. O. Box 110, MC FLTC0007 Tampa, Florida 33601 (678) 259-1449 de.oroark@verizon.com

The attached document consists of a total of 3 pages - cover letter (1 page), Notice of Service (1 page), and Certificate of Service (1 page).

Terry Scobie
Legal Secretary II
Verizon Legal Department
8800 E. Adamo Drive - MC FLTC0007
Tampa, Florida 33619-3526
813-483-2610 (tel)
813-204-8870 (fax)
terry.scobie@verizon.com

Dulaney L. O'Roark IIIVice President-General Counsel, Southeast Region
Legal Department



5055 North Point Parkway Alpharetta, Georgia 30022 Phone 678-259-1449 Fax 678-259-1589 de.oroark@verizon.com

March 13, 2009 - VIA ELECTRONIC MAIL

Ann Cole, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 080278-TL

Joint Petition for show cause proceedings against Verizon Florida LLC for apparent violation of Rule 24-4.070, F.A.C., Customer Trouble Reports, and impose fines, by the Office of the Attorney General, Citizens of the State of Florida, and AARP

Dear Ms. Cole:

Enclosed for filing in the above matter is Verizon Florida LLC's Notice of Service of Objections to Staff's First Set of Interrogatories (Nos. 1-29), First Request for Production of Documents (Nos. 1-11), and First Request for Admissions (Nos. 1-3). Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 678-259-1449.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

tas

Enclosures

DOCUMENT NUMBER-DATE

02207 MAR 138

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition for show cause proceedings)	Docket No. 080278-TL
against Verizon Florida LLC for apparent violation of)	Filed: March 13, 2009
Rule 24-4.070, F.A.C., Customer Trouble Reports,)	
and impose fines, by the Office of the Attorney)	
General, Citizens of the State of Florida, and AARP)	
)	

NOTICE OF SERVICE OF VERIZON FLORIDA LLC'S OBJECTIONS TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-29) STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11) STAFF'S FIRST REQUEST FOR ADMISSIONS (NOS. 1-3)

NOTICE IS HEREBY GIVEN that Verizon Florida LLC, by and through its undersigned counsel, has served its objections to Staff's First Set of Interrogatories (Nos. 1-29), Staff's First Request for Production of Documents (Nos. 1-11), and Staff's First Request for Admissions (Nos. 1-3) via electronic mail on March 13, 2009 to Lee Eng Tan, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850.

A copy of this Notice was also sent via electronic mail on March 13, 2009 to the Office of the Commission Clerk. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on March 13, 2009.

By: s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III 5055 North Point Parkway Alpharetta, Georgia 30022 Phone: (678) 259-1449

Fax: (678) 259-1589

Email: de.oroark@verizon.com

Attorney for Verizon Florida LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail on March 13, 2009 to:

Adam Teitzman, Staff Counsel
Lee Eng Tan, Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ateitzma@psc.state.fl.us
ltan@psc.state.fl.us

Bill McCollum/Cecilia Bradley
Office of Attorney General
The Capitol – PL01
Tallahassee, FL 32399-1050
cecilia.bradley@myfloridalegal.com

J. R. Kelly
Patricia Christensen
Charles Beck
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
kelly.jr@leg.state.fl.us
beck.charles@leg.state.fl.us

Michael B. Twomey
AARP
P. O. Box 5256
Tallahassee, FL 32314-5256
miketwomey@talstar.com

s/ Dulaney L. O'Roark III