## **Dulaney L. O'Roark III**Vice President-General Counsel, Southeast Region Legal Department



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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

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**Enclosures** 

## 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

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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 Itan@psc.state.fl.us

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s/ Dulaney L. O'Roark III