Diamond Williams

From: Sent:	Allen Zoracki [azoracki@kleinlawpllc.com] Friday, December 02, 2011 4:39 PM
To:	Filings@psc.state.fl.us
Cc:	Lee Eng Tan; adam.sherr@qwest.com; michael.cooke@ruden.com; 'Feil, Matthew'; 'Marsha Rule'; 'O'Roark, Dulaney L'; 'Whang, Jane'; agold@acgoldlaw.com; mike@navtel.com; 'Branfman, Eric J.'; 'Macres, Philip J.'; john.greive@lightyear.net; richard.brown@accesspoint.com; 'Messenger, John'; asolar@flatel.net; flatel@aol.com; lhaag@earnestgroup.com; 'Andrew Klein'
Subject:	Docket No. 090538-TP - Granite Telecommunications, LLC Notice of Serving Objections and Responses to Qwest Discovery Requests
Attachments	: Dkt 090538-TP - NOTICE of Srvg Resp - Granite.pdf

Attached for electronic filing in the above-referenced docket, please find Granite Telecommunications, LLC's Notice of Serving Objections and Responses to Qwest Communications Company, LLC's First Set of Interrogatories (Nos. 1-8) and Document Requests (Nos. 1-5). If you have any questions, please do not hesitate to contact us.

a. Persons responsible for filing:

Andrew M. Klein Allen C. Zoracki KLEIN LAW GROUP ^{PLLC} 1250 Connecticut Ave. NW Suite 200 Washington, DC 20036 Phone: (202) 289-6955 AKlein@KleinLawPLLC.com AZoracki@KleinLawPLLC.com

b. Docket No.: 090538-TP – Amended Complaint of Qwest Communications Company, LLC against MCImetro Access, et al.

c. Filed on behalf of: Granite Telecommunications, LLC

d. Total pages: 3

e. Brief Description: Granite Telecommunications, LLC Notice of Serving Objections and Responses to Qwest Communications Company, LLC's First Set of Interrogatories (Nos. 1-8) and Document Requests (Nos. 1-5)

Respectfully submitted,

Allen C. Zoracki KLEIN LAW GROUP ^{PLLC} Direct: (518) 336-4300 General: (202) 289-6955

*Admitted in New York

CONTRACTOR NEWPER OF

0 8758 DEC-2 = FPSC-COMMISSION CLERK

12/2/2011

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Amended Complaint of Qwest Communications Company, LLC against MCImetro Access Transmission Services (d/b/a Verizon Access Transmission Services); XO Communications Services, Inc.; tw telecom of florida, l.p.; Granite Telecommunications, LLC; Broadwing Communications, LLC; Access Point, Inc.; Birch Communications, Inc.; Budget Prepay, Inc.; Bullseye Telecom, Inc.; DeltaCom, Inc.; Ernest Communications, Inc.; Flatel, Inc.; Lightyear Network Solutions, LLC; Navigator Telecommunications, LLC; PaeTec Communications, Inc.; STS Telecom, LLC; US LEC of Florida, LLC; Windstream Nuvox, Inc.; and John Does 1 through 50, for unlawful discrimination.

Docket No. 090538-TP

<u>GRANITE TELECOMMUNICATIONS, LLC'S NOTICE OF SERVING OBJECTIONS</u> <u>AND RESPONSES TO OWEST COMMUNICATIONS COMPANY, LLC'S FIRST SET</u> <u>OF INTERROGATORIES (NOS. 1–8) AND DOCUMENT REQUESTS (NOS. 1-5)</u>

GRANITE TELECOMMUNICATIONS, LLC ("Granite", or "the Company"), by and

through its undersigned counsel, hereby gives notice that the Company has served its objections

and responses to Qwest Communications Company, LLC's First Set of Interrogatories (Nos. 1-8)

and Document Requests (Nos 1-5) upon the parties and in the manner indicated on the attached

certificate of service.

This notice is respectfully submitted by electronic mail the 2nd day of December, 2011.

/s Andrew <u>M.</u> Klein

Andrew M. Klein* Allen C. Zoracki* KLEIN LAW GROUP PLLC 1250 Connecticut Ave. NW, Suite 200 Washington, DC 20036 Phone: (202) 289-6955 Fax: (202) 289-6957 Email: AKlein@KleinLawpllc.com Counsel for Respondent Granite Telecommunications, LLC

* Designated as a qualified representative in Docket No. 100008-OT

POOLMENT NUMBER - DATE

08758 DEC-2=

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE DOCKET NO. 090538-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic delivery and/or U.S. Mail this 2nd day of December, 2011, to the following:

Florida Public Service Commission Theresa Tan Florida Public Service Commission Office of General Counsel 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 Itan@psc.state.fl.us

Qwest Communications Company, LLC Adam L. Sherr Associate General Counsel Qwest 1600 7th Avenue, Room 1506 Seattle, WA 98191 Tel: 206-398-2507 Fax: 206-343-4040 Email: Adam.Sherr@qwest.com

tw telecom of florida, l.p. XO Communications Services, Inc. Windstream NuVox, Inc. Birch Communications, Inc. DeltaCom, Inc. Matthew J. Feil Gunster Yoakley & Stewart, P.A. 215 S. Monroe Street, Suite 618 Tallahassee, FL 32301 mfeil@gunster.com

MCImetro Access Transmission Service d/b/a VerizonAccess Transmission Services Dulaney O'Roark VerizonAccess Transmission Services Six Concourse Pkwy, NE, Ste 800 Atlanta, GA 30328 De.oroark@verizon.com Qwest Communications Company, LLC Michael G. Cooke Ruden McClosky 401 E. Jackson St., Suite 2700 Tampa, FL 33606 Telephone: (813) 222-6685 Facsimile: (813) 314-6985 michael.cooke@ruden.com

Broadwing Communications, LLC Marsha E. Rule Rutledge, Ecenia & Purneli P.O. Box 551 Tallahassee, FL 32302-0551 marsha@reuphlaw.com

XO Communications Services, Inc. Jane Whang Davis Wright Tremain Suite 800 505 Montgomery Street San Francisco, California 94111-6533 JaneWhang@dwt.com BullsEye Telecom, Inc. Andrew M. Klein Allen C. Zoraki Klein Law Group, PLLC 1250 Connecticut Avenue, NW, Suite 200 Washington, D.C. 20036 aklein@kleinlawpllc.com azoracki@kleinlawpllc.com

Navigator Telecommunications, LLC Michael McAlister, General Counsel Navigator Telecommunications, LLC 8525 Riverwood Park Drive P. O. Box 13860 North Little Rock, AR 72113 mike@navtel.com

Lightyear Network Solutions, Inc. John Greive, Vice President of Regulatory Affairs & General Counsel Lightyear Network Solutions, LLC 1901 Eastpoint Parkway Louisville, KY 40223 john.greive@lightyear.net

PAETEC Communications, Inc. and US LEC of Florida, LLC d/b/a PAETEC Business Services John B. Messenger, Vice President and Associate General Counsel PAETEC Communications, Inc. One PaeTec Plaza 600 Willowbrook Office Park Fairpoint, NY 14450 john.messenger@paetec.com

Ernest Communications, Inc. General Counsel 5275 Triangle Parkway, Suite 150 Norcross, GA 30092 lhaag@earnestgroup.com STS Telecom, LLC Alan C. Gold 1501 Sunset Drive 2nd Floor Coral Gables, FL 33143 agold@acgoldlaw.com

Access Point, Inc. Lightyear Network Solutions, LLC Navigator Telecommunications, LLC PAETEC Communications, Inc. US LEC of Florida, LLC d/b/a PAETEC Business Services Eric J. Branfman Philip J. Macres Bingham McCutchen, LLP 2020 K Street NW Washington, DC 20006-1806 eric.branfman@bingham.com

Access Point, Inc. Richard Brown Chairman-Chief Executive Officer Access Point, Inc. 1100 Crescent Green, Suite 109 Cary, NC 27518-8105 Richard.brown@accesspointinc.com

Flatel, Inc. c/o Adriana Solar 2300 Palm Beach Lakes Blvd. Executive Center, Suite 100 West Palm Beach, Florida 33409 asolar@flatel.net

flatel@aol.com

Budget Prepay, Inc. c/o NRAI Services, Inc. 2731 Executive Park Drive, Suite 4 Weston, Florida 33331

/Allen C. Zoracki

Allen C. Zoracki