

Eric Fryson

From: Cooper, Roberta G [Roberta.G.Cooper@CenturyLink.com]
Sent: Wednesday, January 18, 2012 1:41 PM
To: Filings@psc.state.fl.us
Cc: Masterton, Susan S; Sherr, Adam
Subject: 090538-QCC Notice of Service-API
Attachments: 090538 QCC Notice of Service Access Point 1-18-12.pdf

Filed on Behalf of: Susan S. Masterton
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Docket No. 090538

Title of filing: CenturyLink QCC's Notice of Service of Objections and Responses to Access Point Inc.'s First Set of Interrogatories
(Nos. 1-13), and First Request for Production of Documents (Nos. 1-20).

Filed on behalf of: CenturyLink QCC

No of pages: 4

Description: CenturyLink QCC's Notice of Service of Objections and Responses to Access Point Inc.'s First Set of Interrogatories
(Nos. 1-13), and First Request for Production of Documents (Nos. 1-20).

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00341 JAN 18 2012
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1/18/2012

Susan S. Masterton
Senior Counsel



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January 18, 2012

VIA ELECTRONIC FILING

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

Re: Docket No. 090538-TP - Amended Complaint of QWEST COMMUNICATIONS COMPANY, LLC, Against MCIMETRO ACCESS TRANSMISSION SERVICES, LLC (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

Dear Ms. Cole:

Enclosed for filing in the above-referenced docket please find Qwest Communications Company, LLC, d/b/a CenturyLink QCC's Notice of Service of Objections and Responses to Access Point Inc.'s First Set of Interrogatories (Nos. 1-13), and First Request for Production of Documents (Nos. 1-20).

Copies are being served upon the parties in this docket pursuant to the attached certificate of service.

Sincerely,

/s/ Susan S. Masterton
Susan S. Masterton

Enclosures

DOCUMENT NUMBER-DATE
00341 JAN 18 09
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**CERTIFICATE OF SERVICE
DOCKET NO. 090538-TP**

I hereby certify that a true and correct copy of the foregoing has been served upon the following by electronic mail delivery and/or U.S. Mail this 18th day of January, 2012.

<p>Florida Public Service Commission Theresa Tan Office of General Counsel 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 ltan@psc.state.fl.us</p>	<p>Bingham Law Firm Eric J. Branfman/Philip J. Macres 2020 K Street, N.W. Washington, DC 20006 eric.branfman@bingham.com philip.macres@bingham.com</p>
<p>Birch Communications, Inc. Chris Bunce 2300 Main Street, Suite 600 Kansas City, MO 64108-2415 chris.bunce@birch.com</p>	<p>Broadwing Communications, LLC Greg Diamond c/o Level 3 Communications 1025 Eldorado Blvd. Broomfield, CO 80021-8869 Greg.Diamond@level3.com</p>
<p>Budget PrePay, Inc. 1325 Barksdale Blvd., Suite 200 Bossier City, LA 71111-4600</p>	<p>BullsEye Telecom, Inc. David Bailey 25925 Telegraph Road, Suite 210 Southfield, MI 48033-2527 dbailey@bullseyetelecom.com</p>
<p>Jane Whang Davis Wright Tremaine, LLP 505 Montgomery Street, Suite 800 San Francisco, CA 94111 janewhang@dwt.com</p>	<p>Paula W. Foley One Communication--Earthlink 5 Wall Street Burlington, MA 01803 pfoley@corp.earthlink.com</p>
<p>Ernest Communications, Inc. 5275 Triangle Parkway, Suite 150 Norcross, GA 30092-6511</p>	<p>Flatel, Inc. Executive Center, Suite 100 2300 Palm Beach Lakes Blvd. West Palm Beach, FL 33409-3307</p>
<p>Granite Telecommunications, LLC 100 Newport Avenue Extension Quincy, MA 02171-1734 rcurier@granitenet.com</p>	<p>Klein Law Group Andrew M. Klein/Allen C. Zoracki 1250 Connecticut Ave. NW, Suite 200 Washington, DC 20036 AKlein@kleinlawPLLC.com azoracki@kleinlawpllc.com</p>
<p>Lightyear Network Solutions, LLC John Greive, Vice President 1901 Eastpoint Parkway Louisville, KY 40223-4145 john.greive@lightyear.net</p>	<p>PaeTec Communications, Inc. John B. Messenger, Vice President and One PaeTec Plaza 600 Willowbrook Office Park Fairport, NY 14450-4233 john.messenger@paetec.com</p>

<p>Access Point, Inc. Richard Brown 1100 Crescent Green, Suite 109 Cary, NC 27518-8105 Richard.Brown@AccessPointInc.com</p>	<p>Gunster, Yoakley & Stewart, P.A. Matthew J. Feil 215 South Monroe Street, Suite 618 Tallahassee, FL 32301 mfeil@gunster.com</p>
<p>Qwest Communications Company, LLC Adam L. Sherr 1600 7th Avenue, Room 1506 Seattle, WA 98191 Adam.Sherr@qwest.com</p>	<p>Rutledge Law Firm Marsha E. Rule P.O. Box 551 Tallahassee, FL 32302-0551 marsha@reuphlaw.com</p>
<p>Alan G. Gold 1501 Sunset Drive 2nd Floor Coral Gables, FL 33143 agold@acgoldlaw.com</p>	<p>TW Telecom of Florida L.P. Carolyn Ridley 2078 Quail Run Drive Bowling Green, KY 42104 Carolyn.Ridley@twtelecom.com</p>
<p>Division of Regulatory Analysis Brenda Merritt Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 bmerritt@psc.state.fl.us</p>	<p>Verizon Access Transmission Services David Christian 106 East College Avenue, Suite 710 Tallahassee, FL 32301-7721 david.christian@verizon.com</p>
<p>Verizon Florida LLC Dulaney L. O'Roark III Six Concourse Parkway, NE, Suite 800 Atlanta, GA 30328 de.oroark@verizon.com</p>	<p>Windstream NuVox, Inc. Ed Krachmer 4001 Rodney Parham Road MS: 1170-BIFO3-53A Little Rock, AR 7221 2 Edward.Krachmer@windstream.com</p>
<p>XO Communications Services, Inc. Mr. John Ivanuska 10940 Parallel Parkway, Suite K - #353 Kansas City, KS 66109-4515 john.ivanuska@xo.com</p>	<p>Windstream NuVox Inc. James White 5220 Belford Road, Suite 115 Jacksonville, FL 32256-6029 bettye.j.willis@windstream.com</p>

/s/ Susan S. Masterton
Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: 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

DATED: January 18, 2012

QWEST COMMUNICATIONS COMPANY, LLC'S NOTICE OF SERVICE

Qwest Communications Company, LLC, d/b/a CenturyLink QCC ("QCC"), serves notice that, by and through its undersigned counsel, it has served its Objections and Responses to Access Point Inc.'s ("Access") First Set of Interrogatories (Nos. 1-13) and First Request for Production of Documents (Nos. 1-20) and by U.S. Mail to Eric Branfman and Philip J. Macres, 2020 K Street, NW, Washington, DC 20006 and electronically at philip.macres@bingham.com and eric.branfman@bingham.com on this 18th day of January, 2012.

/s/ Susan S. Masterton
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DOCUMENT NUMBER: DATE

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ATTORNEYS FOR QWEST COMMUNICATIONS
COMPANY, LLC D/B/A CENTURYLINK QCC