Eric Fryson

From:	Kim Hancock [khancock@kagmlaw.com]
Sent:	Tuesday, January 24, 2012 3:23 PM
То:	Filings@psc.state.fl.us
Cc:	Lee Eng Tan; Thatch@att.com
Subject:	Docket No. 110087-TP

Attachments: Express Phone NOS 1st ROGs and 1st PODs 1.24.12.pdf

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

a. The name, address, telephone number and email for the person responsible for the filing is:

Vicki Gordon Kaufman Keefe Anchors Gordon & Moyle 118 North Gadsden Street Tallahassee, FL 32301 (850) 681-3828 <u>vkaufman@kagmlaw.com</u>

- b. This filing is made in Docket No. 110087-TP.
- c. The document is filed on behalf of Express Phone Service, Inc.
- d. The total pages in the document are 2 pages.
- e. The attached document is NOTICE OF SERVICE OF EXPRESS PHONE SERVICE, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11) AND FIRST SET OF INTERROGATORIES (NOS. 1-11) TO BELLSOUTH TELECOMMUNICATIONS, INC. d/b/a AT&T FLORIDA d/b/a AT&T SOUTHEAST.

Kim Hancock khancock@kagmlaw.com



Keefe, Anchors, Gordon and Moyle, P.A. The Perkins House 118 North Gadsden Street Tallahassee, Florida 32301 (850) 681-3828 (Voice) (850) 681-8788 (Fax) www.kagmlaw.com

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DOCUMENT NUMPER-DAT

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Notice of adoption of existing interconnection, unbundling, resale, and collocation agreement between BellSouth Telecommunications, Inc. d/b/a AT&T Florida d/b/a AT&T Southeast and Image Access, Inc. d/b/a NewPhone, Inc. by Express Phone Service, Inc.

Docket No. 110087-TP

Filed: January 24, 2012

NOTICE OF SERVICE OF EXPRESS PHONE SERVICE, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11) AND FIRST SET OF INTERROGATORIES (NOS. 1-11) TO BELLSOUTH TELECOMMUNICATIONS, INC. d/b/a AT&T FLORIDA d/b/a AT&T SOUTHEAST

Express Phone Service, Inc. (Express Phone), by and through its undersigned attorneys, hereby gives notice that it has served its First Request for Production of Documents (Nos. 1-11) and First Set of Interrogatories (Nos. 1-11) and to BellSouth Telecommunications, Inc. d/b/a AT&T Florida d/b/a AT&T Southeast (AT&T), on this 24th day of January, 2012.

s/ Vicki Gordon Kaufman

Vicki Gordon Kaufman Keefe Anchors Gordon & Moyle, PA 118 North Gadsden Street Tallahassee, Florida 32301 Telephone: (850)681-3828 Facsimile: (850)681-8788 vkaufman@kagmlaw.com

Mark Foster 707 West Tenth Street Austin, Texas 78701 (512) 708-8700 (Voice) (512) 697-0058 (Fascimile) mark@mfosterlaw.com

Attorneys for Express Phone Service, Inc.

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DOCUMENT NUMBER-DATE 00485 JAN 24 ≌

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Express Phone Service, Inc.'s First Request for Production of Documents (Nos. 1-11) and First Set of Interrogatories (Nos. 1-11) to BellSouth Telecommunications, Inc. d/b/a AT&T Florida d/b/a AT&T Southeast has been furnished by Electronic Mail and U.S. Mail this 24th day of January,

2012, to the following:

Lee Eng Tan Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 <u>ltan@psc.state.fl.us</u>

Tracy Hatch AT&T 150 South Monroe Street, Suite 400 Tallahassee, FL 32301 <u>Thatch@att.com</u>

s/ Vicki Gordon Kaufman

Vicki Gordon Kaufman