

Eric Fryson

From: Marsha Rule [Marsha@reuphlaw.com]
Sent: Tuesday, April 17, 2012 5:54 PM
To: Filings@psc.state.fl.us
Subject: Dkt. 090538

Attachments: 2012.04.17.NOS.pdf

Person Responsible for Filing:

Marsha E. Rule, Attorney
Rutledge, Ecenia & Purnell, P.A.
119 South Monroe St. Suite 202
Tallahassee, FL 32301
850.681.6788

Docket Name and Number: Docket No. 090538-TP – 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.

Filed on Behalf of:

Broadwing Communications, LLC

Total Number of Pages: 4

Description of Documents:

Broadwing's Notice of Service of discovery to Qwest **Marsha E. Rule, Attorney**
Rutledge, Ecenia & Purnell, P.A.
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DOCUMENT NUMBER DATE

02362 APR 18 2012

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Amended Complaint of Qwest Communications }
Company, LLC against MCImetro Access Transmission } Docket No. 090538-TP
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 } Filed: April 18, 2012
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. }

**BROADWING COMMUNICATIONS LLC'S NOTICE OF SERVING ITS
SECOND SET OF INTERROGATORIES (NOS. 19-21), SECOND REQUEST FOR
ADMISSIONS (NOS. 5-17) AND THIRD DOCUMENT REQUESTS (NOS. 22-25)
TO QWEST COMMUNICATIONS COMPANY, LLC**

Broadwing Communications LLC hereby files and serves Notice that on this day it has served its Interrogatories (Nos. 19 - 21), Document Requests (Nos. 22-25) and Requests for Admission (Nos. 5-17) by electronic mail to Mr. Adam L. Sherr, Qwest Communications Company, LLC, 1600 7th Avenue, Room 1506, Seattle, WA 98191, (adam.sherr@centurylink.com) and Susan S. Masterton, Century Link QCC, 315 South Calhoun Street, Suite 500, Tallahassee, FL 32301, (susan.masterton@centurylink.com); with copies to the persons and in the manner listed on the certificate of service below.

Respectfully submitted this 17TH day of April, 2012.

/s/ Marsha E. Rule

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*Attorneys for Broadwing
Communications, LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by email (or if no email is indicated, by U.S. Mail) this 17TH day of April, 2012.

Lee Eng Tan Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 ltan@psc.state.fl.us	Eric J. Branfman/Philip J. Macres Bingham Law Firm 2020 K Street, NW Washington, DC 20006 eric.branfman@bingham.com Philip.macres@bingham.com
Mr. Chris Bunce Birch Communications, Inc. 2300 Main Street, Suite 600 Kansas City, MO 64108-2415 Chris.bunce@birch.com	Mr. Greg Diamond Broadwing Communications, Inc. c/o Level 3 Communications 1025 Eldorado Boulevard Broomfield, CO 80021-8869 Greg.Diamond@level3.com
Budget PrePay, Inc. 1325 Barksdale Boulevard Suite 200 Bossier City, LA 71111-4600 ddavid@budgetprepay.com	Mr. David Bailey BullsEye Telecom, Inc. 25925 Telegraph Road, Suite 210 Southfield, MI 48033-2527 dbailey@bullseyetelecom.com

<p>Jane Whang Davis Wright Tremaine LLP 505 Montgomery Street, Suite 800 San Francisco, CA 94111 jane whang@dwt.com</p>	<p>Paula Foley One Communications, an Earthlink Business Company 5 Wall Street Burlington, MA 01803 pfoley@corp.earthlink.com</p>
<p>Ernest Communications, Inc. 5275 Triangle Parkway, Suite 150 Norcross, GA 30092-6511 lhaag@earnestgroup.com</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 rcurrier@granitenet.com</p>	<p>Andrew M. Klein/Allen C. Zoracki Klein Law Group 1250 Connecticut Ave. NW, Suite 200 Washington, DC 20036 AKlein@kleinlawPLLC.com azoracki@kleinlawpllc.com</p>
<p>John Greive Lightyear Network Solutions, LLC 1901 Eastpoint Parkway Louisville, KY 40223-4145 john.greive@lightyear.net</p>	<p>Michael McAlister Navigator Telecommunications, LLC P.O. Box 13860 North Little Rock, AR 72113-0860 mike@navtel.com</p>
<p>John B. Messenger PaeTec Communications, Inc. One PaeTec Plaza 600 Willowbrook Office Park Fairport, NY 14450-4233 john.messenger@paetec.com</p>	<p>Richard Brown Access Point, Inc. 1100 Crescent Green, Suite 109 Cary, NC 27511 Richard.brown@accesspointinc.com</p>
<p>Adam L. Sherr Qwest Communications Company, LLC 1600 7th Avenue, Room 1506 Seattle, WA 98191 Adam.Sherr@qwest.com</p>	<p>Laura King Division of Regulatory Analysis Florida Public Service Commissio 2540 Shumard Oak Blvd. Tallahassee, FL 32399 lking@psc.state.fl.us</p>
<p>Susan S. Masterton Century Link QCC 315 South Calhoun Street, Suite 500 Tallahassee, FL 32301 Susan.masterton@centurylink.com</p>	<p>Matt Feil Gunster Law Firm 215 South Monroe, Suite 601 Tallahassee, FL 32301 mfeil@gunster.com</p>

<p>Alan C. Gold, P.A. 1501 Sunset Drive, 2nd Floor Coral Gables, FL 33143 acgold@acgoldlaw.com</p>	<p>Ms. Carolyn Ridley tw telecom of florida l.p. 2078 Quail Run Drive Bowling Green, KY 42104 Carolyn.Ridley@twtelecom.com</p>
<p>Brenda Merritt Division of Regulatory Analysis Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 bmerritt@psc.state.fl.us</p>	<p>Mr. David Christian Verizon Access Transmission Services 106 East College Avenue, Suite 710 Tallahassee, FL 32301-7721 david.christian@verizon.com</p>
<p>Dulaney L. O'Roark III Verizon 5055 North Point Parkway Alpharetta, GA 30022 678-259-1657 (phone) 678-259-5326 (fax) de.oroark@verizon.com</p>	<p>Ed Krachmer Windstream NuVox, Inc. 4001 Rodney Parham Road MS: 1170-B1F03-53A Little Rock, AR 72212 Edward.Krachmer@windstream.com</p>
<p>Ms. Kristin Shulman XO Communications 810 Jorie Blvd. Suite 200 Oak Brook IL 60523 Kris.Shulman@xo.com</p>	<p>James White Windstream NuVox, Inc. 4651 Salisbury Road, Suite 151 Jacksonville, FL 32256-6187 Bettye.j.willis@windstream.com</p>

/s/ Marsha E. Rule

Marsha E. Rule