BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Re: Petition for Arbitration of Interconnection Agreement Between AT&T Florida Telecommunications, LLC d/b/a AT&T Florida and Communications Authority, Inc.

Docket 140156-TP

<u>COMMUNICATIONS AUTHORITY, INC.'s RESPONSE TO STAFF'S FIRST</u> REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1)

Pursuant to Rule 28.106-206, Florida Administrative Code, Communications Authority, Inc. ("CA"), by its attorneys, responds to the Commission Staff's ("Staff") first request for production of documents as follows:

 Please provide the insurance limit section of the ICA that was referenced in witness Ray's direct testimony on page 19, lines 11 through 14.

CA Response- Please see Attachment 1. It contains the insurance section from the Verizon Clear

Rate Communications interconnection agreement as cited in Mr. Ray's direct testimony on page

19, lines 11 through 14.

Dated: March 24, 2015

By: <u>/s/ Mike Ray</u> Mike Ray CEO and President Communications Authority, Inc. 11523 Palm Brush Trail #401 Lakewood Ranch, FL 34202 941 600-0207 mike@commauthority.com Respectfully submitted,

By: <u>/s/ Kristopher E. Twomey</u> Kristopher E. Twomey Law Office of Kristopher E. Twomey, P.C. 1725 I Street, NW, Suite 300 Washington, DC 20006 202 681-1850 kris@lokt.net *Attorney for Communications Authority, Inc.*

COMMUNICATIONS AUTHORITY, INC.'s RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1) DOCKET NO. 140156-TP

ATTACHMENT 1

Insurance Section from Verizon-Clear Rate ICA (ICA adopted by Terra Nova Telecom, Inc.)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Communications Authority,				DOCKET NO. 140156-TP
Inc. for arbitration	of	Section	252(b)	
interconnection agreement with AT&T Florida				DATED: FEBRUARY 2, 2015
Telecommunications,	LLC	d/b/a	AT&T	
Florida.				

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of COMMUNICATIONS AUTHORITY, INC.'s

RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1)

has been served by electronic mail this day of March 24, 2015:

Tracey Hatch, Esquire 150 South Monroe Street, Suite 400 Tallahassee, FL 32301 Email: th9467@att.com

Lee Eng Tan Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Itan@psc.state.fl.us

Communications Authority Mike Ray 11523 Palm Brush Trail, #401 Lakewood Ranch, FL 34202 mike@commauthority.com

AT&T Florida Elise McCabe 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1561 em4870@att.com

<u>/s/ Kristopher E. Twomey</u> Kristopher E. Twomey Counsel to Communications Authority, Inc.