RECEIVED- ITPSC

Kimberly Caswell

Vice President and General Counsel, Southeast Legal Department

02 FEB 27 AM 10: 40

COMMISSION CLERK



FLTC0007 201 North Franklin Street (33602) Post Office Box 110 Tampa, Florida 33601-0110

Phone 813 483-2606 Fax 813 204-8870 kimberly.caswell@verizon.com

February 27, 2002

Ms. Blanca S. Bayo, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 990649B-TP

Investigation into Pricing of Unbundled Network Elements (Sprint/Verizon track)

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of Verizon Florida Inc.'s Notices of Service of Responses to AT&T and MCl's First Set of Interrogatories (Nos. 1-47) and First Request for Production of Documents (Nos. 1-19) in the above matter. Also enclosed are an original and 15 copies of a Request for Confidential Classification. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-2617.

Sincerely,

Why blir

Kimberly Caswell

KC:tas

Enclosures

AUS CAF
CMP
COM
CTR
ECR
GCL
OPC
MMS
SEC T
OTH

RECEIVED & FILED

DOCUMENT HUMPER-DATE

- men of FRK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network elements (Sprint/Verizon track)

Docket No. 990649B-TP Filed: February 27, 2002

NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S RESPONSES TO AT&T AND MCI'S FIRST SET OF INTERROGATORIES (NOS. 1-47)

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Responses to AT&T and MCI's First Set of Interrogatories (Nos. 1-47), which were legally propounded by AT&T/MCI on January 28, 2002, was sent via overnight delivery on February 26, 2002 to Tracy W. Hatch, Esq., Messer, Caparello & Self, P.A., 215 S. Monroe Street, Suite 701, Tallahassee, Florida 32302.

The original and one copy of this Notice were also sent via overnight delivery on February 26, 2002 to the Director, Division of the Commission Clerk and Administrative Services at the Commission. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on February 27, 2002.

Bv:

Ru

Kimberly Caswell

P. O. Box 110, FLTC0007

Tampa, Florida 33601

Telephone: 813-483-2617

Attorney for Verizon Florida Inc.

DOCUMENT NEWSONS LATE 02289 FEB 27 % FPSC-00 LIBSS OR CLERA

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network elements (Sprint/Verizon track))	Docket No. 990649B-TP Filed: February 27, 2002
)	

NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S RESPONSES TO AT&T AND MCI'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-19)

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Responses to AT&T and MCI's First Request for Production of Documents (Nos. 1-19), which were legally propounded by AT&T/MCI on January 28, 2002, was sent via overnight delivery on February 26, 2002 to Tracy W. Hatch, Esq., Messer, Caparello & Self, P.A., 215 S. Monroe Street, Suite 701, Tallahassee, Florida 32302.

The original and one copy of this Notice were also sent via overnight delivery on February 26, 2002 to the Director, Division of the Commission Clerk and Administrative Services at the Commission. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on February 27, 2002.

3v:

Kimberly Caswell

P. O. Box 110, FLTC0007 Tampa, Florida 33601

Telephone: 813-483-2617

Attorney for Verizon Florida Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Notice of Service and Responses to AT&T and MCI's First Set of Interrogatories (Nos. 1-47), Notice of Service of Responses to AT&T and MCI's First Request for Production of Documents (Nos. 1-19), and Request for Confidential Classification in Docket No. 990649B-TP were sent via electronic mail and/or U.S. mail on February 27, 2002 to the parties on the attached list.

Bu Kimberly Caswell

Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Pennington Law Firm *
Marc W. Dunbar
Karen M. Camechis
215 S. Monroe St., 2nd Floor
Tallahassee, FL 32301

AT&T *
Marsha Rule
101 N. Monroe Street
Suite 700
Tallahassee, FL 32301-1549

BellSouth Telecommunications * Nancy B. White c/o Nancy H. Sims 150 South Monroe St., Suite 400 Tallahassee, FL 32301-1556

Florida Cable Telecomm. Assoc. * Michael A. Gross 246 East 6th Avenue, Suite 100 Tallahassee, FL 32303

Florida Public Tele. Assoc. Angela Green 2292 Wednesday Street Suite 2 Tallahassee, FL 32308

MCI WorldCom Inc. *
Donna Canzano McNulty
The Atrium Building, Suite 105
325 John Knox Road
Tallahassee, FL 32303-4131

John Spilman Broadslate Networks Inc. 675 Peter Jefferson Parkway Suite 310 Charlottesville, VA 22911 Brent E. McMahan VP-Reg./Govt. Affairs Network Telephone Corp. 815 South Palafox Street Pensacola, FL 32501

Time Warner Telecom * Carolyn Marek 233 Bramerton Court Franklin, TN 37069 Joseph McGlothlin *
McWhirter Reeves Law Firm
117 S. Gadsden Street
Tallahassee, FL 32301

Stephen C. Reilly Office of Public Counsel 111 W. Madison Street Room 812 Tallahassee, FL 32399-1400

Bruce May Holland Law Firm 315 S. Calhoun Street Suite 600 Tallahassee, FL 32301

Richard D. Melson * Gabriel E. Nieto Hopping Law Firm 123 S. Calhoun Street Tallahassee, FL 32314 Jim Lamoureux*
Virginia Tate*
AT&T
1200 Peachtree Street
Suite 8100
Atlanta, GA 30309

Mark Buechele Supra Telecommunications Koger Center-Ellis Building 1311 Executive Center Drive Suite 200 Tallahassee, FL 32301-5027 Vicki Gordon Kaufman *
McWhirter Reeves Law Firm
117 South Gadsden Street
Tallahassee, FL 32301

Gregory J. Darnell *
MCI WorldCom Inc.
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328

Charles Rehwinkel *
Susan Masterton*
Sprint-Florida
1313 Blairstone Road
MC FLTLHO0107
Tallahassee, FL 32301

Marc B. Rothschild Swidler & Berlin 3000 K Street NW, Suite 300 Washington, DC 20007-5116 Catherine F. Boone *
Covad Comm. Co.
10 Glenlake Parkway
Suite 650
Atlanta, GA 30328-3495

George S. Ford*
Chief Economist
Z-Tel Communications Inc.
601 S. Harbour Island Blvd.
Tampa, FL 33602

Jonathan E. Canis Michael B. Hazzard Kelley Drye & Warren 1200 19th St. NW, 5th Floor Washington, DC 20036 Rodney L. Joyce Shook Hardy & Bacon LLP 600 14th St. N.W., Suite 800 Washington, DC 20005-2004

Tracy W. Hatch/Floyd R. Self Messer Law Firm 215 S. Monroe Street Suite 701 Tallahassee, FL 32302 Eric Branfman/Morton Posner * Swidler & Berlin 3000 K Street NW, Suite 300 Washington, DC 20007-5116 Florida Digital Network, Inc. 390 North Orange Avenue Suite 2000 Orlando, FL 32801

Charles Pellegrini
Patrick Wiggins
Katz Kutter Law Firm
106 East College Avenue
12th Floor
Tallahassee, FL 32301

Network Access Solutions Corp. 13650 Dulles Technology Drive Herndon, VA 20171-4602 John D. McLaughlin, Jr. KMC Telecom III, Inc. 1755 North Brown Road Lawrenceville, GA 30034