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**Richard Chapkis** Vice President & General Counsel, Southeast Region Legal Department



FLTC0717 201 North Franklin Street (33602) Post Office Box 110 Tampa, Florida 33601-0110

Phone 813 483-1256 Fax 813 273-9825 11. richard.chapkis@verizon.com 20 ω P Ν

March 31, 2003

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

Docket No. 981834-TP Re:

Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth Telecommunications Inc.'s Service Territory

Docket No. 990321-TP

Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of Verizon Florida Inc.'s Notices of Service of Responses to Staff's Third Set of Interrogatories (Nos. 46-59) and Third Request for Production of Documents (Nos. 19-37) in the above matters. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-1256.

Sincerely,

Richard A. Claipter AUS CAF CMP **Richard Chapkis** COM CTR ECR RC:tas ----- Enclosures

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### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth Telecommunications Inc.'s Service Territory

Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation Docket No. 981834-TP

Docket No. 990321-TP Filed: March 31, 2003

#### NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S RESPONSES TO STAFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 19-37)

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s

Responses to Staff's Third Request for Production of Documents (Nos. 19-37), which was

legally propounded by Staff on March 10, 2003, was sent via overnight delivery and

electronic mail (wknight@psc.state.fl.us) on March 31, 2003, to Wayne Knight, Staff Counsel,

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

0850.

The original and one copy of this Notice were also sent via overnight delivery on

March 28, 2003 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.

DOCUMENT NUMPER-DATE U 2974 MAR 31 8 FPSC-COMMISSION CLERK Respectfully submitted on March 31, 2003.

By: -Richard A: Charph

Richard Chapkis Verizon Florida Inc. Post Office Box 110, FLTC0717 Tampa, Florida 33601 Telephone: 813-483-1256

Catherine Ronis Daniel McCuaig Jonathan Frankel Wilmer Cutler & Pickering 2445 M Street N.W. Washington, DC 20037-1420 Telephone: 202-663-6000

Attorneys for Verizon Florida Inc.

#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Competitive Carriers for Commission ) D Action to Support Local Competition in BellSouth ) Telecommunications Inc.'s Service Territory ) Petition of ACI Corp. d/b/a Accelerated Connections, ) D Inc. for generic investigation to ensure that BellSouth ) Fi Telecommunications, Inc., Sprint-Florida, ) Incorporated, and GTE Florida Incorporated comply ) with obligation to provide alternative local exchange ) carriers with flexible, timely, and cost-efficient ) physical collocation

Docket No. 981834-TP

Docket No. 990321-TP Filed: March 31, 2003

#### NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S RESPONSES TO STAFF'S THIRD SET OF INTERROGATORIES (NOS. 46-59)

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s

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of Service, appended hereto.

Respectfully submitted on March 31, 2003.

Th chard A. Chapter By:

Richard Chapkis Verizon Florida Inc. Post Office Box 110, FLTC0007 Tampa, Florida 33601 Telephone: 813-483-1256

Catherine Ronis Daniel McCuaig Jonathan Frankel Wilmer Cutler & Pickering 2445 M Street N.W. Washington, DC 20037-1420 Telephone: 202-663-6000

Attorneys for Verizon Florida Inc.

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Notice of Service and Responses to Staff's Third Set of Interrogatories (Nos. 46-59) and Notice of Service of Responses to Staff's Third Request for Production of Documents (Nos. 19-37) in Docket Nos. 981834-TP and 990321-TP were sent via U.S. mail and electronic mail on March 31, 2003 to the parties on the attached list.

Richard Chapkis

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

Richard D. Melson Gabriel E. Nieto Hopping Law Firm 123 S. Calhoun Street Tallahassee, FL 32314

Peter M. Dunbar Barbara Auger Pennington Law Firm 215 S. Monroe St., 2<sup>nd</sup> Floor Tallahassee, FL 32301

Kenneth Hoffman Rutledge Law Firm 215 S. Monroe St., Suite 420 Tallahassee, FL 32302

Terry Monroe/Genevieve Morelli CompTel 1900 M Street N.W. Suite 800 Washington, DC 20036

David Tobin Fla. Public Telecomm. Assn. c/o Tobin & Reyes 7251 W. Palmetto Park Road #205 Boca Raton, FL 33433-3487

Donna McNulty MCI WorldCom 1203 Governors Square Blvd. Suite 201 Tallahassee, FL 32301-2960 Nancy Sims BellSouth Telecomm. Inc. 150 S. Monroe Street, Suite 400 Tallahassee, FL 32301-1556

Virginia C. Tate/Lisa A. Riley AT&T 1200 Peachtree Street N.E. Suite 8066 Atlanta, GA 30309-3523

Catherine Ronis Daniel McCuaig Jonathan Frankel Wilmer Cutler & Pickering 2445 M Street N.W. Washington, DC 20037-1420

Andrew Isar Telecomm. Resellers Assn. c/o Miller Isar, Inc. 7901 Skansie Ave., Suite 240 Gig Harbor, WA 98335

Michael A. Gross Florida Cable Telecomm. Assn. 246 E. 6<sup>th</sup> Avenue, Suite 100 Tallahassee, FL 32303

John D. McLaughlin, Jr. KMC Telecom Inc. 1755 North Brown Road Lawrenceville, GA 30043-8119

Floyd R. Self/Tracy Hatch Messer Law Firm P. O. Box 1876 Tallahassee, FL 32302 Rodney L. Joyce Shook Hardy & Bacon LLP 600 14<sup>th</sup> St NW, Suite 800 Washington, DC 20005-2004

Norton Cutler Development Specialists Inc. c/o Steve Victor 70 West Madison Street Suite 2300 Chicago, IL 60602-4250

Nanette S. Edwards ITC^DeltaCom 4092 S. Memorial Parkway Huntsville, AL 35802-4343

C. Pellegrini/Patrick Wiggins Katz Kutter Law Firm 106 E. College Avenue 12<sup>th</sup> Floor Tallahassee, FL 32301

Vicki Kaufman/Joe McGlothlin McWhirter Law Firm 117 S. Gadsden Street Tallahassee, FL 32301

Deborah Eversole General Counsel Kentucky Public Service Comm. P. O. Box 615 Frankfort, KY 40602

David Woodsmall Mpower Comm. Corp. 175 Sully's Trail, Suite 300 Pittsford, NY 14534-4558 Mark E. Buechele Supra Telecommunications 2620 SW 27<sup>th</sup> Avenue Miami, FL 33133

William H. Weber Covad Communications Co. 1230 Peachtree Street N.E. 19<sup>th</sup> Floor Atlanta, GA 30309-3574

Bettye Willis ALLTEL Communications Services Inc. One Allied Drive Little Rock, AR 72203

Anita L. Fourcard Lockheed Martin IMS Comm. Industry Services 1200 K Street, N.W. Washington, DC 20005 Laura L. Gallagher MediaOne Florida Tele. 101 E. College Avenue Suite 302 Tallahassee, FL 32301

S. Masterton/C. Rehwinkel Sprint-Florida Incorporated 1313 Blairstone Road MC FLTLHO0107 Tallahassee, FL 32301

J. Jeffry Wahlen Ausley & McMullen 227 S. Calhoun Street Tallahassee, FL 32302

Brent McMahan Network Telephone Corporation 815 South Palafox Street Pensacola, FL 32501

Don Sussman Network Access Solutions Corp. Three Dulles Tech Center 13650 Dulles Technology Drive Herndon, VA 20171-4602

Carolyn Marek Time Warner Telecom 233 Bramerton Court Franklin, TN 37069

Anu Seam U.S. Department of Justice Telecom Task Force Antitrust Division 1401 H Street N.W., Suite 8000 Washington, DC 20530

Matthew Feil Florida Digital Network Inc. 390 N. Orange Avenue Suite 2000 Orlando, FL 32801