

Diamond Williams

From: Galloway, Cecilia (Cissy) [CGalloway@gunster.com]
Sent: Friday, December 02, 2011 3:44 PM
To: Filings@psc.state.fl.us
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Subject: RE: PSC Filing Docket No 090538-TP

Attachments: Qwest - STS 12-2 Notice filing.pdf

The attached is an electronic filing for the docket referenced below. If you have any questions, please contact Matt Feil at the number below. Thank you.

Person Responsible for Filing:

Matthew Feil
 Gunster Law Firm
 215 South Monroe Street, Suite 601
 Tallahassee, FL 32301
 Direct: 850-521-1708
 Main: 850-521-1980
mfeil@gunster.com

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: STS Telecom, LLC

Total Number of Pages: 5

Description of Documents: Notice of Serving Objections and Responses to Qwest's First Set of Discovery to STS Telecom, LLC

12/2/2011

DOCUMENT NUMBER-DATE
 08751 DEC-2 =
 FPSC-COMMISSION CLERK



GUNSTER

FLORIDA'S LAW FIRM FOR BUSINESS

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Tax Advice Disclosure: To ensure compliance with requirements imposed by the IRS under Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments), unless otherwise specifically stated, was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any matters addressed herein. Click the following hyperlink to view the complete Gunster IRS Disclosure & Confidentiality note.

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December 2, 2011

VIA ELECTRONIC-FILING

Ms. Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: 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.

Dear Ms. Cole:

Enclosed is STS Telecom, LLC's Notice of Serving Objections and Responses to Qwest Communications Company, LLC's First Set of Interrogatories (Nos. 1 - 8) and Document Requests (Nos. 1-6), submitted by electronic mail in the above referenced docket.

Sincerely,



Matthew J. Feil
MJF/ccg

Enclosures

DOCUMENT NUMBER DATE

0875 | DEC-2 =

FPSC-COMMISSION CLERK

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, } Filed: December 2, 2011
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. }

**STS TELECOM, LLC'S NOTICE OF SERVING OBJECTIONS AND
RESPONSES TO QWEST COMMUNICATIONS COMPANY, LLC'S FIRST SET
OF INTERROGATORIES (NOS. 1-8) AND DOCUMENT REQUESTS (NOS. 1-6)**

STS TELECOM, LLC ("STS", or "the Company"), by and through its undersigned counsel, hereby gives notice that the Company has served its objections and responses to Qwest Communications Company, LLC's First Set of Interrogatories (Nos. 1-8) and Document Requests (Nos 1-6) by electronic mail and/or U.S. Mail to Mr. Adam L. Sherr and Mr. Michael G. Cooke. Copies of the objections and responses have been provided to parties consistent with the attached Certificate of Service.

This notice is respectfully submitted by electronic mail the 2nd day of December, 2011.



Matthew J. Feil
Gunster, Yoakley & Stewart, P.A.
215 S. Monroe Street, Suite 601
Tallahassee, Florida 32301
Telephone: (850) 521-1980
Facsimile: (850) 576-0902

DOCUMENT NUMBER - DATE

08751 DEC-2 =

FPSC-COMMISSION CLERK


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by email, and/or U.S. Mail this 2nd day of December, 2011.

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	Mr. David Bailey BullsEye Telecom, Inc. 25925 Telegraph Road, Suite 210 Southfield, MI 48033-2527 dbailey@bullseyetelecom.com
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<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>Mr. Douglas Hsiao Qwest Communications Company, LLC 1801 California Street, 10th Floor Denver, CO 80202-2632 doug.hsiao@qwest.com</p>	<p>Alex M. Duarte Qwest Communications Company, LLC 421 SW Oak Street, Suite 810 Portland, OR 97204 Alex.Duarte@qwest.com</p>
<p>Adam L. Sherr Qwest Communications Company, LLC 1600 7th Avenue, Room 1506 Seattle, WA 98191 Adam.Sherr@qwest.com</p>	<p>Jason D. Topp Qwest Communications, LLC 200 South Fifth Street, Room 2200 Minneapolis, MN 55402 Jason.Topp@qwest.com</p>
<p>Michael G. Cooke Ruden Law Firm 215 South Monroe Street, Suite 815 Tallahassee, FL 32301 Michael.Cooke@Ruden.com</p>	<p>Marsha Rule Rutledge Law Firm Post Office Box 551 Tallahassee, FL 32302 marsha@reuphlaw.com</p>
<p>STS Telecom, LLC P.O. Box 822270 Pembroke Pines, FL 33082-2270</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) <u>de.oroark@verizon.com</u></p>	<p>Ed Krachmer Windstream NuVox, Inc. 4001 Rodney Parham Road MS: 1170-B1F03-53A Little Rock, AR 72212 <u>Edward.Krachmer@windstream.com</u></p>
<p>Mr. John Ivanuska XO Communications Services, Inc. 10940 Parallel Parkway, Suite K - #353 Kansas City, KS 66109-4515 <u>john.ivanuska@xo.com</u></p>	<p>James White Windstream NuVox, Inc. 4651 Salisbury Road, Suite 151 Jacksonville, FL 32256-6187 <u>Bettye.j.willis@windstream.com</u></p>
<p>Jane J. Whang Davis Wright Tremaine LLP Suite 800 505 Montgomery Street San Francisco, California 94111-6533 <u>janewhang@dwt.com</u></p>	

By: 
Matthew Feil, Esq.