TOM LEE President



Harold McLean **Public Counsel** 

# ORIGINAL

## STATE OF FLORIDA OFFICE OF PUBLIC COUNSEL

C/O THE FLORIDA LEGISLATURE 111 WEST MADISON ST. **ROOM 812** TALLAHASSEE, FLORIDA 32399-1400 850-488-9330

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ALLEN BENSE

Speaker

Charles J. Beck **Deputy Public Counsel** 

FPSC-COMMISSION CLERK

December 30, 2004

Blanca S. Bayo, Director Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket No. 040604-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 1 copy of the Notice of Service of Citizens' Responses and Objections to Verizon's First Request for Production of Documents (Nos. 1-9) to the Office of Public Counsel.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

CMP				Sincerely,		
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#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Adoption of the I					
Program and an incom	ne-based criterion at or				
below 135% of the Fed	deral Poverty Guidelines				
as eligibility criteria for the Lifeline and Link-					
Up programs	$\omega s = \pi s_0$				
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Docket No. 040604-TL

Filed: December 30, 2004

### NOTICE OF SERVING RESPONSES AND OBJECTIONS

The Citizens of the State of Florida, by and through Harold McLean, Public Counsel, serve this notice that they have responded and objected to Verizon Florida Inc.'s First Request for Production of Documents (Nos. 1-9) to the Office of Public Counsel.

Respectfully submitted,

Charles J. Beck
Deputy Public Counsel

Fla. Bar No. 217281

Office of Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400

Attorney for the Citizens of the State of Florida

### DOCKET NO. 040604-TL CERTIFCATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or

hand-delivery to the following parties on this 30st day of December, 2004.

Charles J. Beck

Samantha Cibula Division of Legal Services Fla. Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Charles Rehwinkel Sprint-Florida Incorporated 1313 Blairstone Road FLTH00107 Tallahassee, FL 32301

Michael Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecomm. Assoc.
246 East 6<sup>th</sup> Avenue
Tallahassee, FL 32303

Michael B. Twomey Post Office Box 5256 Tallahassee, FL 32314-5256

Kenneth A. Hoffman, Esquire Martin P. McDonnell, Esquire Rutledge, Ecenia, Purnell & Hoffman 215 South Monroe Street, Suite 420 Tallahassee, Florida 32301 Nancy B. White c/o Nancy H. Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, FL 32301

Richard Chapkis
Vice President & General Counsel
Verizon Florida, Inc.
201 North Franklin Street
FLTH0717
Tampa, FL 33601

Thomas M. McCabe, Manager TDS Telecom P.O. Box 189 Ouincy, FL 32353-0189

Coralette Hannon, Esquire Senior Legislative Representative AARP Department of State Affairs 6705 Reedy Creek Road Charlotte, North Carolina 28215-7035

Mark Ellmer GTC, Inc. d/b/a GT COM P.O. Box 220 Port St. Joe, FL 32457 Betty Willis ALLTEL ALLTEL Communications One Allied Drive, B4F4ND Little Rock, AR 72203-2177

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Donna Canzano McNulty, Esq. MCI 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301