

Kimberly Caswell  
Vice President and General Counsel, Southeast  
Legal Department

RECEIVED-FPSC

02 MAR -6 PM 12:47



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

March 6, 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 Staff's Sixth Set of Interrogatories (Nos. 129-187) and Fifth Request for Production of Documents (Nos. 63-68) 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,

  
Kimberly Caswell

KC:tas  
Enclosures

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC \_\_\_\_\_  
OTH Gene Ag

RECEIVED & FILED  
  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
02593 MAR-6 8

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No. 990649B-TP  
Filed: March 6, 2002

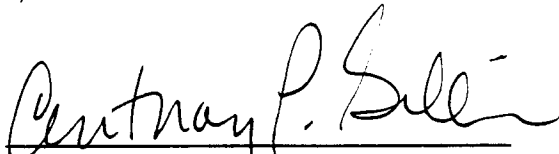
**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S RESPONSES TO  
STAFF'S FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS  
(NOS. 63-68)**

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Responses to Staff's Fifth Request for Production of Documents (Nos. 63-68), which were legally propounded by Staff on February 19, 2002, was sent via overnight delivery on March 5, 2002 and electronic mail on March 6, 2002, to Jason K. Fudge, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

The original and one copy of this Notice were also sent via overnight delivery on March 5, 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 March 6, 2002.

By:

  
\_\_\_\_\_

Kimberly Caswell  
P. O. Box 110, FLTC0007  
Tampa, Florida 33601  
Telephone: 813-483-2617

Attorney for Verizon Florida Inc.

DOCUMENT NUMBER-DATE

02593 MAR-6 02

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

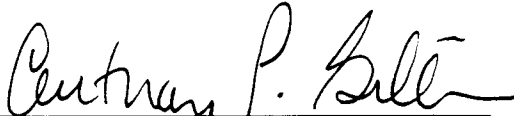

Docket No. 990649B-TP  
Filed: March 6, 2002

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S RESPONSES TO  
STAFF'S SIXTH SET OF INTERROGATORIES  
(NOS. 129-187)**

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Responses to Staff's Sixth Set of Interrogatories (Nos. 129-187), which were legally propounded by Staff on February 19, 2002, was sent via overnight delivery on March 5, 2002 and electronic mail on March 6, 2002, to Jason K. Fudge, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

The original and one copy of this Notice were also sent via overnight delivery on March 5, 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.

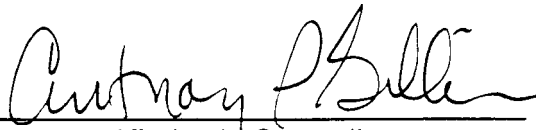
Respectfully submitted on March 6, 2002.

By:   
 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 Staff's Sixth Set of Interrogatories (Nos. 129-187), Notice of Service of Responses to Staff's Fifth Request for Production of Documents (Nos. 63-68) and Request for Confidential Classification in Docket No. 990649B-TP were sent via electronic mail and/or U.S. mail on March 6, 2002 to the parties on the attached list.

  
\_\_\_\_\_  
for 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., 2<sup>nd</sup> 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 6<sup>th</sup> 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 19<sup>th</sup> St. NW, 5<sup>th</sup> Floor  
Washington, DC 20036

Rodney L. Joyce  
Shook Hardy & Bacon LLP  
600 14<sup>th</sup> 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  
12<sup>th</sup> 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