Kimberly Caswell Vice President and General Counsel, Southeast Legal Department



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October 11, 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

PM 4: E 5SC

Re: Docket No. 020412-TP Petition for arbitration of unresolved issues in negotiation of interconnection agreement with Verizon Florida Inc. by US LEC of Florida Inc.

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of Verizon Florida Inc.'s Notice of Service of Second Set of Requests for Production of Documents to US LEC of Florida Inc. in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

KC:tas Enclosures

AUS _____ CAF _____ COM _____ CTR _____ ECR _____ GCL ____ OPC ____ MMS ____ SEC ____ OTH ____

RECEIVEE FPSC-BUREAU OF RECORDS

DOCUMENT REPORT OF THE 1 1076 OCT 118 FPSC-COLUMESTON CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for arbitration of unresolved issues in negotiation of interconnection agreement with Verizon Florida Inc. by US LEC of Florida Inc. Docket No. 020412-TP Filed: October 11, 2002

NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO US LEC OF FLORIDA INC.

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its Second Set of Requests for Production of Documents on Kenneth Hoffman, Esq., Rutledge, Ecenia, Purnell & Hoffman, P.A., 215 South Monroe Street, Suite 420, Tallahassee, FL 32302-0551 and Michael L. Shor, Esq. Swidler Berlin Shereff Friedman, LLP, 3000 K Street, NW, Suite 300, Washington, DC 20007 via overnight delivery on October 10, 2002. The original and one copy of this Notice were sent via overnight delivery on October 10,

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 October 11, 2002.

Na Bv:

Kimberly Caswell Verizon Florida Inc. Post Office Box 110, FLTC0007 Tampa, Florida 33601 (813) 483-2617

> Aaron M. Panner Scott H. Angstreich Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C. 1615 M Street, N.W., Suite 400 Washington, D.C. 20036 (202) 326-7900

Attorneys for Verizon Florida Inc.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Notice of Service and Second Set of Requests for Production of Documents to US LEC of Florida Inc. in Docket No. 020412-TP were sent via overnight delivery(*) on October 10, 2002 and U.S. mail(**) on October 11, 2002 to the parties on the attached list.

Cutha Pale Bur Kimberly Caswell

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

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Wanda Montano(**) US LEC of Florida Inc. 6801 Morrison Boulevard Charlotte, NC 28211-3500 Kenneth Hoffman(*) Martin McDonnell Rutledge Law Firm 215 S. Monroe Street, Suite 420 Tallahassee, FL 32301

Gregory Romano(**) Verizon 1515 N. Courthouse Road Suite 500 Arlington, VA 22201 Michael L. Shor(*) Richard Rindler Swidler Berlin Law Firm 3000 K Street, NW Washington, DC 20007

Aaron M. Panner(**) Scott H. Angstreich Kellogg Huber Law Firm 1615 M Street, NW Suite 400 Washington, DC 20036