

ORIGINAL

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  
richard.chapkis@verizon.com

RECEIVED-TPSC  
APR 10 10:55  
COMMISSION CLERK

April 10, 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

Re: Docket No. 981834-TP  
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 Fourth Set of Interrogatories (Nos. 60-66)  
and Fourth Request for Production of Documents (Nos. 38-46) 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,

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

*Richard A. Chapkis*  
Richard Chapkis  
RC:tas  
Enclosures

RECEIVED & FILED  
*lh*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
03345 APR 10 2003  
FPSC-COMMISSION CLERK

**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	) ) ) )	Docket No. 981834-TP
<hr/> 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. 990321-TP Filed: April 10, 2003

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S RESPONSES TO  
STAFF'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 38-46)**

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Responses to Staff's Fourth Request for Production of Documents (Nos. 38-46), which was legally propounded by Staff on March 21, 2003, was sent via overnight delivery and electronic mail ([wknight@psc.state.fl.us](mailto:wknight@psc.state.fl.us)) on April 10, 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 April 9, 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 NUMBER DATE

03345 APR 10 8

FPSC-COMMISSION CLERK

Respectfully submitted on April 10, 2003.

By: Richard A Chapkis

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.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Competitive Carriers for Commission	)	Docket No. 981834-TP
Action to Support Local Competition in BellSouth	)	
Telecommunications Inc.'s Service Territory	)	
<hr/>		
Petition of ACI Corp. d/b/a Accelerated Connections,	)	Docket No. 990321-TP
Inc. for generic investigation to ensure that BellSouth	)	Filed: April 10, 2003
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	)	
<hr/>		

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S RESPONSES TO STAFF'S FOURTH SET OF INTERROGATORIES (NOS. 60-66)**

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Responses to Staff's Fourth Set of Interrogatories (Nos. 60-66), which was legally propounded by Staff on March 21, 2003, was sent via overnight delivery and electronic mail ([wknight@psc.state.fl.us](mailto:wknight@psc.state.fl.us)) on April 10, 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 sent via overnight delivery on April 9, 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.

Respectfully submitted on April 10, 2003.

By: Richard A Chapkis

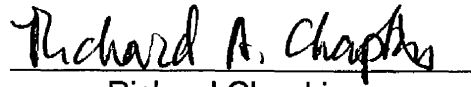
Richard Chapkis  
Verizon Florida Inc.  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601  
Telephone: 813-483-1256

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 Fourth Set of Interrogatories (Nos. 60-66) and Notice of Service of Responses to Staff's Fourth Request for Production of Documents (Nos. 38-46) in Docket Nos. 981834-TP and 990321-TP were sent via U.S. mail and electronic mail on April 10, 2003 to the parties on the attached list.

  
Richard Chapkis

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

Nancy Sims  
BellSouth Telecomm. Inc.  
150 S. Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

Rodney L. Joyce  
Shook Hardy & Bacon LLP  
600 14<sup>th</sup> St NW, Suite 800  
Washington, DC 20005-2004

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Donna McNulty  
MCI WorldCom  
1203 Governors Square Blvd.  
Suite 201  
Tallahassee, FL 32301-2960

Floyd R. Self/Tracy Hatch  
Messer Law Firm  
P. O. Box 1876  
Tallahassee, FL 32302

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

Laura L. Gallagher  
MediaOne Florida Tele.  
101 E. College Avenue  
Suite 302  
Tallahassee, FL 32301

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

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

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

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

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

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

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

Brent McMahan  
Network Telephone Corporation  
815 South Palafox Street  
Pensacola, FL 32501  
Orlando, FL 32801

Matthew Feil  
Florida Digital Network Inc.  
390 N. Orange Avenue  
Suite 2000