

ORIGINAL



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April 10, 2003

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

RECEIVED-FPSC  
03 APR 10 PM 4:40  
COMMISSION  
CLERK

Re: Docket No. 981834-TP & 990321-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and one copy of Sprint's Notice of Service of Responses to Staffs Fourth Request for Production of Documents (No. 22-30).

Copies are being served on the parties in this docket pursuant to the attached Certificate of Service.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to the courier. If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Susan S. Masterton

Enclosure

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**CERTIFICATE OF SERVICE  
DOCKET NO. 981834-TP & 990321-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served Electronically and by U.S. Mail or Hand Delivery\* this 10th day of April, 2003 to the following:

Wayne Knight, Esq. \*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

Ausley Law Firm  
Jeff Wahlen  
Post Office Box 391  
Tallahassee, Florida 32302

Nancy B. White  
c/o Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 S. Monroe Street Suite 400  
Tallahassee, Florida 32301-1556

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

Alltel Communications Services, Inc.  
Bettye Willis  
One Allied Drive  
Little Rock, AR 72203-2177

Messer Law Firm  
Floyd Self/Tracy Hatch  
Post Office Box 1876  
Tallahassee, Florida 32302

Pennington Law Firm  
Karen Camechis  
Post Office Box 1009  
Tallahassee, Florida 32302

MediaOne Florida Telecommunications,  
Inc.  
c/o Laura L. Gallagher, P.A.  
101 E. College Ave., Suite 302  
Tallahassee, Florida 32301

Florida Cable Telecommunications  
Association, Incorporated  
Michael A. Gross  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303

AT&T Communications of the  
Southern States, Inc.  
Virginia C. Tate  
1200 Peachtree Street, NE  
Suite 8066  
Atlanta, GA 30309

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

Katz, Kutter Law Firm  
Charles Pellegrini/Patrick Wiggins  
12<sup>th</sup> Floor  
106 East College Avenue  
Tallahassee, Florida 32301

FCCA  
c/o McWhirter Law Firm  
Vicki Kaufman  
117 S. Gadsden Street  
Tallahassee, Florida 32301

Supra Telecommunications &  
Information Systems, Inc.  
Mark E. Buechele  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, FL 33133

ITC^DeltaCom Communications, Inc.  
Nanette Edwards  
Messer, Caparello & Self  
Post Office Box 1876  
Tallahassee, Florida 32302-1876


Network Telephone Corporation  
Brent E. McMahan  
815 South Palafox Street  
Pensacola, FL 32501-5937

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

Florida Digital Network, Inc.  
Matthew Feil, Esq.  
390 North Orange Ave., Suite 2000  
Orlando, FL 32801

Verizon-Florida, Incorporated  
Richard Chapkis  
c/o David Chirstian  
106 East College Avenue, Suite 810  
Tallahassee, Florida 32301-7704

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

  
\_\_\_\_\_  
Susan S. Masterton

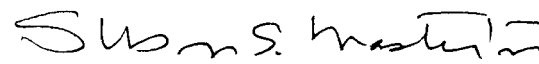
**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Petition of Competitive	)	Docket No. 981834-TP
Carriers for Commission action to	)	
support local competition in BellSouth	)	
Telecommunications, Inc.'s service	)	
territory.	)	
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Petition of ACI Corp. d/b/a Accelerated	)	
Connections, Inc. for generic investigation to	)	Docket No. 990321-TP
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.	)	Date: April 10, 2003
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**SPRINT'S NOTICE OF SERVICE OF RESPONSES TO STAFF'S FOURTH  
REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 22-30)**

NOTICE IS HEREBY GIVEN that a copy of the responses of Sprint-Florida, Incorporated, hereinafter ("Sprint") to the Staff of the Florida Public Service Commission, hereinafter ("Staff"), fourth Request for Production of Documents (No. 22-30), which was legally propounded by Staff, on March 21, 2003 was submitted Electronically and via hand delivery to Wayne D. Knight, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850. Copies of this Notice have been served on the parties to this docket pursuant to the attached Certificate of Service.

RESPECTFULLY SUBMITTED this 10th day of April, 2003.

Handwritten signature of Susan S. Masterton in black ink, written in a cursive style.

Susan S. Masterton  
P.O. Box 2214  
MS: FLTLHO0107  
Tallahassee, Florida 32316  
850/599-1560

ATTORNEY FOR SPRINT