

ORIGINAL



Tracy Hatch  
Senior Attorney  
Law and Government Affairs  
Southern Region

Suite 700  
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Tallahassee, FL 32301  
850-425-6360

May 13, 2003

**BY HAND DELIVERY**

Ms. Blanca Bayó, Director  
The Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

RECEIVED-FPSC  
03 MAY 13 AM 10: 22  
COMMISSION  
CLERK

Re: **Docket Nos. 981834-TP and 990321-TP**

Dear Ms. Bayó:

Enclosed for filing are an original and one copy of AT&T Communications of the Southern States, LLC's Notices of Serving Responses to Verizon's First Set of Interrogatories and Verizon's First Request for Production of Documents in the above-referenced docket.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to Lisa Riley Sapper in the enclosed stamped envelope.

Thank you for your assistance with this filing.

Sincerely yours,

*Tracy Hatch/las*

Tracy W. Hatch

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

TWH/las  
Enclosure  
cc: Parties of Record

RECEIVED & FILED  
*lh*  
FPSC-BUREAU OF RECORDS

*Responses to PODs +  
Interrogatories detached  
and forwarded to GCL.*

DISTRIBUTION CENTER  
03 MAY 13 AM 10: 05  
DOCUMENT NUMBER-05  
04262 MAY 13 8  
FPSC-COMMISSION CLERK

**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	)	
_____	)	
Petition of ACI Corp. d/b/a Accelerated Connections,	)	Docket No. 990321-TP
Inc. for generic investigation to ensure that BellSouth	)	Filed: May 13, 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	)	
_____	)	

**NOTICE OF SERVICE OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S RESPONSES TO VERIZON'S FIRST SET OF INTERROGATORIES (NOS. 1-4)**

NOTICE IS HEREBY GIVEN that a true and correct copy of AT&T Communications of the Southern States, LLC's Responses to Verizon's First Set of Interrogatories (Nos. 1-4), which were legally propounded by Verizon on April 23, 2003, was sent via electronic mail and overnight delivery to Richard A. Chapkis at [Richard.Chapkis@verizon.com](mailto:Richard.Chapkis@verizon.com) and to Verizon's offices located at One Tampa City Center, 201 North Franklin Street, P.O. Box 110, MC FLTC0007, Tampa, Florida 33601-0110.

The original and one copy of this Notice were also sent via overnight delivery on April 28, 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 May 13, 2003.

By: Tracy Hatch / las

Tracy W. Hatch, Esq.

AT&T Communications of the Southern States, LLC

101 N. Monroe Street, Suite 700

Tallahassee, FL 32301

(850) 425-6360

Attorney for AT&T Communications of the Southern  
States, LLC

**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	)	
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Petition of ACI Corp. d/b/a Accelerated Connections,	)	Docket No. 990321-TP
Inc. for generic investigation to ensure that BellSouth	)	Filed: May 13, 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	)	
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**NOTICE OF SERVICE OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S RESPONSES TO VERIZON'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-3)**

NOTICE IS HEREBY GIVEN that a true and correct copy of AT&T Communications of the Southern States, LLC's Responses to Verizon's First Request for Production of Documents (Nos. 1-3), which were legally propounded by Verizon on April 23, 2003, was sent via electronic mail and overnight delivery to Richard A. Chapkis at [Richard.Chapkis@verizon.com](mailto:Richard.Chapkis@verizon.com) and to Verizon's offices located at One Tampa City Center, 201 North Franklin Street, P.O. Box 110, MC FLTC0007, Tampa, Florida 33601-0110.

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Respectfully submitted on May 13, 2003.

By: Tracy Hatch / las

Tracy W. Hatch, Esq.

AT&T Communications of the Southern States, LLC

101 N. Monroe Street, Suite 700

Tallahassee, FL 32301

(850) 425-6360

Attorney for AT&T Communications of the Southern  
States, LLC

## CERTIFICATE OF SERVICE

DOCKET NOS. 981834 & 990321

I HEREBY CERTIFY that a copy of the foregoing has been furnished via  
U.S. Mail this 13<sup>th</sup> day of May, 2003, to the following parties of record:

Wayne Knight Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850	ALLTEL Communications Services, Inc. Bettye Willis One Allied Drive Little Rock, AR 72203-2177 Phone: (501) 905-8330 Fax: (501) 905-6299
Ausley Law Firm Jeffrey Wahlen P.O. Box 391 Tallahassee, FL 32302 Phone: 850-224-9115 Fax: 222-7560	BellSouth Telecommunications, Inc. Nancy B. White c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556 Phone: (850) 224-7798 Fax: 222-8640
Florida Digital Network, Inc. Matthew Feil, Esq. 390 North Orange Ave., Suite 2000 Orlando, FL 32801 Phone: (407) 835-0460 Fax: (407) 835-0309 Email: <a href="mailto:mfeil@floridadigital.net">mfeil@floridadigital.net</a>	<i>Hopping Law Firm</i> <i>Richard Melson</i> <i>P.O. Box 6526</i> <i>Tallahassee, FL 32314</i> <i>Phone: 850-222-7500</i> <i>Fax: 224-8551</i>
Florida Cable Telecom. Assoc., Inc. Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303 Phone: 850-681-1990 Fax: 681-9676 Email: <a href="mailto:mgross@fcta.com">mgross@fcta.com</a>	Florida Competitive Carriers Assoc. c/o McWhirter Law Firm Vicki Kaufman 117 S. Gadsden St. Tallahassee, FL 32301 Phone: 850-222-2525 Fax: 222-5606
ITC^DeltaCom Ms. Nanette S. Edwards Messer, Caparelo & Self PO BOX 1876 Tallahassee, FL 32302-1876 Email: <a href="mailto:NEdwards@itcdeltacom.com">NEdwards@itcdeltacom.com</a>	<i>KMC Telecom, Inc.</i> <i>Mr. John D. McLaughlin, Jr.</i> <i>1755 North Brown Road</i> <i>Lawrenceville, GA 30043-8119</i> <i>Phone: (678) 985-6262</i> <i>Fax: (678) 985-6213</i> <i>Email: <a href="mailto:jmclau@kmctelecom.com">jmclau@kmctelecom.com</a></i>
Katz, Kutter Law Firm Charles Pellegrini/Patrick Wiggins 12th Floor	<i>MCI WorldCom Communications, Inc.</i> <i>Ms. Donna C. McNulty</i> <i>1203 Governors Square Blvd., Suite 201</i>

106 East College Avenue Tallahassee, FL 32301 Phone: 850-224-9634 Fax: 222-0103	Tallahassee, FL 32301-2960 Phone: (850) 219-1008 Fax: 219-1018 Email: <a href="mailto:donna.mcnulty@wcom.com">donna.mcnulty@wcom.com</a>
Network Telephone Corporation Brent E. McMahan 815 South Palafox Street Pensacola, FL 32501-5937 Phone: (850) 432-4855 Fax: (850) 437-0724	Pennington Law Firm Peter Dunbar/ Marc Dunbar P.O. Box 1009 Tallahassee, FL 32302 Phone: 850-222-3533 Fax: 222-2126
Sprint Communications Company Limited Partnership Susan S. Masterton P.O. Box 2214 MC: FLTLHO0107 Tallahassee, FL 32316-2214 Phone: (850) 847-0244 Fax: 878-0777 Email: <a href="mailto:susan.masterton@mail.sprint.com">susan.masterton@mail.sprint.com</a>	Supra Telecommunications & Information Systems, Inc. Mark E. Buechele 2620 S.W. 27th Avenue Miami, FL 33133 Phone: 305-531-5286 Fax: 305-476-4282
Time Warner Telecom Ms. Carolyn Marek Regulatory Affairs, Southeast Region 233 Bramerton Court Franklin, TN 37069 Phone: (615) 376-6404 Fax: (615) 376-6405 Email: <a href="mailto:carolyn.marek@twtelecom.com">carolyn.marek@twtelecom.com</a>	Verizon Florida Inc. Ms. Michelle A. Robinson PO BOX 110, FLTC0007 Phone: (813) 483-2526 Fax: (813) 223-4888 Email: <a href="mailto:Michelle.Robinson@verizon.com">Michelle.Robinson@verizon.com</a>
Beth Keating, Esq. Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0870	MediaOne Florida Telecom., Inc. c/o Laura L. Gallagher, P.A. 101 E. College Ave., Suite 302 Tallahassee, FL 32301
BellSouth Telecom., Inc. Patrick W. Turner/R. Douglas Lackey 675 W. Peachtree St., Suite 4300 Atlanta, GA 30375	Messer Law Firm Floyd Self/Norman Horton PO BOX 1876 Tallahassee, FL 32302

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