

WILMER, CUTLER & PICKERING

2445 M STREET, N.W.  
WASHINGTON, D.C. 20037-1420

TELEPHONE (202) 663-6000  
FACSIMILE (202) 663-6363

WASHINGTON  
NEW YORK  
BALTIMORE  
NORTHERN VIRGINIA  
LONDON  
BRUSSELS  
BERLIN

May 13, 2003

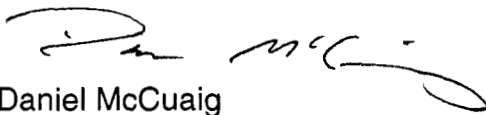
Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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

Dear Ms. Bayó:

Please find enclosed for filing an original and one copy of Verizon Florida Inc.'s Notice of Service of Verizon Florida Inc.'s First Set of Interrogatories to ITC^DeltaCom 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 (202) 663-6024.

Sincerely,

  
Daniel McCuaig

Enclosures

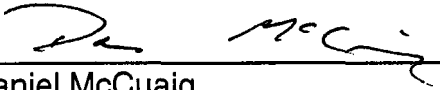
DOCUMENT NUMBER-DATE

04429 MAY 19 8

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s First Set of Interrogatories to ITC^DeltaCom in Docket Nos. 981834-TP and 990321-TP were e-mailed on May 13, 2003 (with service via First Class U.S. Mail or Facsimile to follow) to the parties on the attached list.

  
\_\_\_\_\_  
Daniel McCuaig

**CERTIFICATE OF SERVICE**  
**Docket No. 981834-TP and 990321 TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail this 13th day of May, 2003 (with service via First Class U.S. Mail or Facsimile to follow) to the following:

Beth Keating, Staff Counsel  
C. Lee Fordham, Staff Counsel  
Wayne Knight, Staff Counsel  
Adam Teitzman, Staff Counsel  
Andrew Maurey; Betty Gardner  
Cheryl Bulecza-Banks  
David Dowds  
Jackie Schindler  
Jason-Earl Brown  
Laura King; Bob Casey  
Pat Lee; Stephanie Cater  
Paul Vickery  
Pete Lester; Zoryana Ring  
Sally Simmons  
Shevie Brown  
Todd Brown  
Victor Mckay  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6212  
Fax. No. (850) 413-6250  
bkeating@psc.state.fl.us  
cfordham@psc.state.fl.us  
wknight@psc.state.fl.us  
ateitzma@psc.state.fl.us  
amaurey@psc.state.fl.us  
bgardner@psc.state.fl.us  
cbulecza@psc.state.fl.us  
david.dowds@psc.state.fl.us  
jschindl @psc.state.fl.us  
jebrown@psc.state.fl.us  
lking@psc.state.fl.us; bcasey@psc.state.fl.us  
plee@psc.state.fl.us; scater@psc.state.fl.us  
pvickery@psc.state.fl.us  
plester@psc.state.fl.us; zring@psc.state.fl.us  
sasimmon@psc.state.fl.us  
sbbrown@psc.state.fl.us  
tbrown@psc.state.fl.us  
vmckay@psc.state.fl.us

Terry Monroe  
Vice President, State Affairs  
Competitive Telecomm. Assoc.  
1900 M Street, N.W. Suite 800  
Washington, D.C. 20036  
Tel. No. (202) 296-6650  
Fax. No. (202) 296-7585  
tmonroe@comptel.org

Marilyn H. Ash  
MGC Communications, Inc.  
3301 North Buffalo Drive  
Las Vegas, Nevada 89129  
Tel. No. (702) 310-8461  
Fax. No. (702) 310-5689  
mash@mgccom.com

J. Phillip Carver  
Senior Attorney  
Nancy Sims  
Nancy White  
Stan Greer  
BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
Tel. No. (404) 335-0710  
J.Carver@bellsouth.com  
nancy.sims@bellsouth.com  
nancy.white@bellsouth.com  
stan.greer@bellsouth.com

Peter M. Dunbar, Esq. Pennington,  
Moore, Wilkinson & Dunbar, P.A.  
Post Office Box 10095 Tallahassee,  
Florida 32302  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126  
pete@penningtonlawfirm.com

Carolyn Marek  
Vice President of Regulatory Affairs  
Southeast Region  
Time Warner Communications  
233 Bramerton Court  
Franklin, Tennessee 37069  
Tel. No. (615) 376-6404  
Fax. No. (615) 376-6405  
Represented by Pennington Law Firm  
Carolyn.Marek@twtelecom.com

Jonathan Audu  
Paul Turner  
Supra Telecommunications  
& Information Systems, Inc.  
2620 S.W. 27th Avenue  
Miami, FL 33133  
Tel. No. (305) 531-5286  
Fax. No. (305) 476-4282  
jonathan.audu@stis.com  
pturner@stis.com

Florida Digital Network, Inc.  
Matthew Feil, Esq.  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801  
Tel. No. (407) 835-0460  
Fax. No. (407) 835-0309  
mfeil@floridadigital.net

Michael A. Gross  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue, Suite 100  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
mgross@fcta.com

TCG South Florida  
c/o Rutledge Law Firm  
Kenneth Hoffman  
P.O. Box 551  
Tallahassee, FL 32302-0551  
Tel. No. (850) 681-6788  
Fax. No. (850) 681-6515  
ken@reuphlaw.com

Laura L. Gallagher  
Laura L. Gallagher, P.A.  
101 E. College Avenue Suite 302  
Tallahassee, FL 32301  
Tel. No. (850) 224-2211  
Fax. No. (850) 561-3611  
Represents MediaOne  
gallagherl@gtlaw.com

Susan S. Masterton  
Charles J. Rehwinkel  
Sprint Comm. Co. LLP  
P.O. Box 2214  
MC: FLTLHOO107  
Tallahassee, FL 32316-2214  
Tel. No. (850) 847-0244  
Fax. No. (850) 878-0777  
susan.masterton@mail.sprint.com

Sprint-Florida, Incorporated  
Mr. F. B. (Ben) Poag  
P.O. Box 2214 (MC FLTLHOO107)  
Tallahassee, FL 32316-2214  
Tel: 850-599-1027  
Fax: 407-814-5700  
ben.poag@mail.sprint.com

William H. Weber, Senior Counsel  
Gene Watkins  
Covad Communications  
1230 Peachtree Street, N.E.  
19th Floor  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3494  
Fax. No. (404) 942-3495  
wweber@covad.com  
gwatkins@covad.com

Bettye Willis  
ALLTEL Comm. Svcs. Inc.  
One Allied Drive  
Little Rock, AR 72203-2177  
bettye.j.willis@alltel.com

J. Jeffry Wahlen  
Ausley & McMullen  
P.O. Box 391  
Tallahassee, FL 32302  
jwahlen@ausley.com

Rodney L. Joyce  
Shook, Hardy & Bacon, L.L.P.  
600 14th Street, N.W.  
Suite 800  
Washington, DC 20005-2004  
Tel. No. (202) 639-5602  
Fax. No. (202) 783-4211  
Counsel for Network Access Solutions  
rjoyce@shb.com

Brent McMahan, Vice President  
Regulatory and Governmental Affairs  
Network Telephone Corporation  
815 South Palafox Street  
Pensacola, FL 32501  
Tel. No. (850) 432-4855  
Fax. No. (850) 437-0724  
Brent.McMahan@networktelephone.net

Network Access Solutions Corp.  
Mr. Don Sussman  
Three Dulles Tech Center  
13650 Dulles Technology Drive  
Herndon, VA 20171-4602  
Tel. No.: (703) 793-5102  
Fax. No. (208) 445-7278  
dsussman@nas-corp.com

Ms. Nanette S. Edwards  
4092 South Memorial Parkway  
Huntsville, AL 35802-4343  
Tel. No. (256) 382-3856  
Fax. No. (256) 382-3936  
nedwards@itcdeltacom.com

Ms. Lisa A. Riley  
Michael Henry  
Roger Fredrickson  
Mellony Michaux  
1200 Peachtree Street, N.E.  
Suite 8066  
Atlanta, GA 30309-3523  
Tel. No. (404) 810-7812  
Fax. No. (404) 877-7646  
lisariley@att.com  
michaeljhenry@att.com  
rfredrickson@att.com  
mmichaux@att.com

Tracy Hatch  
North Monroe Street, Suite 700  
Tallahassee, FL 32301-1549  
Tel No. (850) 425-6360  
thatch@att.com

FPTA, Inc.  
Mr. David Tobin Tobin & Reyes  
7251 West Palmetto Park Road  
#205  
Boca Raton, FL 33433-3487  
Tel. No. (561) 620-0656  
Fax. No. (561) 620-0657  
dst@tobinreyes.com

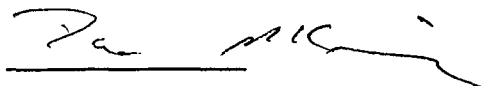
John McLaughlin  
KMC Telecom. Inc.  
Mr. John D. McLaughlin, Jr.  
1755 North Brown Road  
Lawrenceville, GA 30043  
Tel. No. (678) 985-6261  
Fax. No. (678) 985-6213  
jmclau @kmctelecom.com

Tim Perry  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman, Arnold,  
& Steen, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Attys. for FCCA  
Atty. for Network Telephone Corp.  
Atty. for BlueStar  
tperry@mac-law.com

Andrew Isar  
Telecomm. Resellers Assoc.  
7901 Skansie Avenue  
Suite 240  
Gig Harbor, WA 98335  
Tel. No. (253) 851-6700  
Fax. No. (253) 851-6474  
aisar@millerisar.com

Floyd R. Self, Esq.  
Messer, Capareello & Self, P.A.  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Represents AT&T  
Represents ITCADeltaCom  
fself@lawfla.com

Richard D. Melson  
Hopping Green Sams & Smith, P.A.  
Post Office 6526  
123 South Calhoun Street  
Tallahassee, FL 32314  
Tel. No. (850) 222-7500  
Fax. No. (850) 224-8551  
Atty. For ACI  
rmelson@hgslaw.com

  
\_\_\_\_\_  
Daniel McCuaig

**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

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

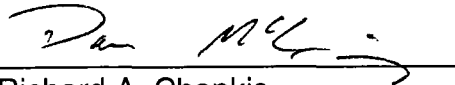
Filed: May 13, 2003

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S  
FIRST SET OF INTERROGATORIES (NOS. 1-17)  
TO ITC^DELTACOM**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Set of Interrogatories to ITC^DeltaCom on Nanette S. Edwards, 4092 South Memorial Parkway, Huntsville, Alabama 35802-4343 via electronic mail (nedwards@itcdeltacom.com) and First Class U.S. Mail on May 13, 2003.

The original and one copy of this Notice were sent via First Class U.S. Mail on May 13, 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:   
Richard A. Chapkis  
Verizon Florida Inc.  
One Tampa City Center  
201 North Franklin Street  
Post Office Box 110, MC FLTC0007  
Tampa, FL 33601-0110  
Telephone: 813-483-2606  
Fax: 813-204-8870

Catherine Kane Ronis  
Daniel McCuaig  
Wilmer, Cutler & Pickering  
2445 M Street NW  
Washington, DC 20007  
Telephone: 202-663-6024  
Fax: 202-663-6363

Attorneys for Verizon Florida Inc.