## ORIGINAL STATE OF FLORIDA

Commissioners: Lila A. Jaber, Chairman J. Terry Deason Braulio L. Baez Rudolph "Rudy" Bradley Charles M. Davidson



OFFICE OF THE GENERAL COUNSEL HAROLD A. MCLEAN GENERAL COUNSEL (850) 413-6199

# Hublic Service Commission

June 4, 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 COMMISSION

### Re: Docket Nos. 981834-TP & 990321-TP

Dear Ms. Bayó:

AJT:js Enclosure

CMP

COM CTR ECR

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Enclosed for filing on behalf of Commission Staff are the original and one copy of Staff's Notice of Service of Responses to AT&T Communications of the Southern States, LLC's First Request for Production of Documents to FPSC Staff.

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 me.



Sincerely,

Adam 1. Teitzman Attorney



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PSC Website: http://www.floridapsc.com

Internet E-mail: contact@psc.state.fl.us

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.	DOCKET NO. 981834-TP DOCKET NO. 990321-TP JUNE 4, 2003
In re: 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.	

#### NOTICE OF SERVICE

NOTICE IS HEREBY GIVEN that a copy of the responses of Commission Staff's Responses to AT&T of the Southern States, LLC's First Request for Production of Documents (No. 1), which was legally propounded by AT&T, on May 15, 2003, was submitted electronically and by U.S. Mail by Tracy W. Hatch, Senior Attorney, AT&T of the Southern States, LLC, 101 North Monroe Street, Suite 700, Tallahassee, Florida 32301-6360. Copies of this Notice have been served on the parties to this docket pursuant to the attached Certificate of Service. COMMISSION STAFF'S RESPONSE TO AT&T OF THE SOUTHERN STATES, LLC'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1) DOCKETS NOS. 981834-TP, 990321-TP PAGE 2

RESPECTFULLY SUBMITTED this 4<sup>th</sup> day of June, 2003.

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ADAM J. TEITZMAN Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Voice: (850) 413-6199 Fax: (850) 413-6250

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.	DOCKET NO. 981834-TP
In re: 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 JUNE 4, 2003

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one true and correct copy of Staff's Response to AT&T Communications of the Southern States, Inc., LLC's First Request for Production of Documents (No. 1) have been furnished to Tracy Hatch, 101 North Monroe Street, Suite 700, Tallahassee, FL 32301, on behalf of AT&T Communications of the Southern States, Inc. by electronic mail and Hand Delivery, and that one true and correct copy of the forgoing has been furnished by electronic mail and U.S. Mail this 4<sup>th</sup> day of June, 2003, to the following: CERTIFICATE OF SERVICE DOCKETS NOS. 981834-TP, 990321-TP PAGE 2

Messer Law Firm Floyd Self P.O. Box 1876 Tallahassee, FL 32302

AT&T Lisa A. Riley 1200 Peachtree Street, NE Suite 8066 Atlanta, GA 30309-3523

AT&T Communications of the Southern States, Inc. Virginia C. Tate 1200 Peachtree Street, NE Suite 8100 Atlanta, GA 30309

Telecommunications Resellers Association Andrew Isar c/o Miller Isar, Inc. 7901 Skansie Avenue Suite 240 Gig Harbor, WA 98335

FPTA, Inc. David Tobin Tobin & Reyes 7251 West Palmetto Park Road Suite No. 205 Boca Raton, FL 33433

CompTel Terry Monroe/Genevieve Morelli 1900 M. Street, NW Suite 800 Washington, DC 20036 John McLaughlin KMC Telecom, Inc. 1755 North Brown Road Lawrenceville, GA 30043

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

Florida Competitive Carriers Association/Network Telephone/BlueStar c/o McWhirter Law Firm Vicki Gordon Kaufman 117 S. Gadsden Street Tallahassee, FL 32301

TCG South Florida c/o Rutledge Law Firm Kenneth Hoffman P.O. Box 551 Tallahassee, FL 32302

Peter Dunbar Pennington Moore Wilkinson & Dunbar, PA P.O. Box 10095 Tallahassee, FL 32302

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Time Warner Telecom Carolyn Marek Regulatory Affairs Southeast Region 233 Bramerton Court Franklin, TN 37069

Sprint Communications Co. LLP Susan Masterton P.O. Box 2214 MC: FLTLH00107 Tallahassee, FL 32316-2214

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

Verizon Florida, Inc. Richard Chapkis c/o David Christian 106 East College Avenue Suite 810 Tallahassee, FL 32301-7704 Katz Kutter Law Firm 106 East College Avenue 12<sup>th</sup> Floor Tallahassee, FL 32301

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

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

Sprint-Florida, Incorporated Ben Poag P.O. Box 2214 MC: FLTLH00107 Tallahassee, FL 32316-2214

Supra Telecommunications & Information Systems Paul Turner 2620 S.W. 27<sup>th</sup> Avenue Miami, FL 33133 CERTIFICATE OF SERVICE DOCKETS NOS. 981834-TP, 990321-TP PAGE 4

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

ADAM J. /TEITZMAN

ADAM J. (TEITZMAN) Staff Counsel

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FLORIDA PUBLIC SERVICE COMMISSION Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Voice: (850) 413-6199 Fax: (850) 413-6250