ORIGINAL

## MCWHIRTER REEVES

TAMPA OFFICE: 400 NORTH TAMPA STREET, SUITE 2450 TAMPA, FLORIDA 33602 P. O. BOX 3350 TAMPA, FL 33601-3350 (813) 224-0866 (813) 221-1854 FAX PLEASE REPLY TO:

TALLAHASSEE

Tallahassee Office: 117 South Gadsden Tallahassee, Florida 32301 (850) 222-2525 (850) 222-5606 Fax

August 20, 2003

### VIA HAND DELIVERY

Blanca S. Bayo, Director Division of Records and Reporting Betty Easley Conference Center 4075 Esplanade Way Tallahassee, Florida 32399-0870

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

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), enclosed for filing and distribution are the original and 1 copy of the following:

Notice of Service of DIECA Communications, Inc. d/b/a Covad Communications Company's First Set of Interrogatories to Verizon Florida, Inc. (Nos. 1 - 5) and First Request for Production of Documents

to Verizon Florida, Inc. (No. 1);

Notice of Service of DIECA Communications, Inc. d/b/a Covad Communications Company's First Set of Interrogatories to Sprint-Florida, Incorporated (Nos. 1 - 5) and First Request for Production of Documents to Sprint-Florida, Incorporated (No. 1); and,

AUS CAF Notice of Service of DIECA Communications, Inc. d/b/a Covad CMP Communications Company's First Set of Interrogatories to BellSouth COM CTR Telecommunications (Nos. 1 - 5) and First Request for Production of ECR Documents to BellSouth Telecommunications (No. 1). GCL OPC RECEIVED & FILED MMS SEC OTH

FPSC-BUREAU OF RECORDS

Ms. Blanca Bayo August 20, 2003 Page 2

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman

Vicei Gram Laufman

VGK/bae Enclosure

### 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

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. 981834-TP

Docket No. 990321-TP

Filed: August 20, 2003

# NOTICE OF SERVICE OF DIECA COMMUNICATIONS, INC. D/B/A COVAD COMMUNICATIONS COMPANY'S FIRST SET OF INTERROGATORIES TO BELLSOUTH TELECOMMUNICATIONS (NOS. 1 – 5) AND

## FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO BELLSOUTH TELECOMMUNICATIONS (NO. 1)

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), files Notice that it has served its First Set of Interrogatories to BellSouth Telecommunications, Inc. (Nos. 1 - 5) and First Request for Production of Documents to BellSouth Telecommunications (No. 1), by hand delivery and electronic mail to: Nancy White c/o Nancy Sims, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301, on this 20th day of August 2003.

DOCUMENT NUMBER-CATE

FPSC-COMMISSION CLERK

Charles (Gene) Watkins

Covad Communications Co.

1230 Peachtree Street, N.E., 1944 Floor

Atlanta, GA 30309

(404) 942-3494

(404) 942-3495 (fax)

gwatkins@covad.com

Vicki Gordon Kaufman

McWhirter, Reeves, McGlothlin, Davidson,

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117 South Gadsden Street

Tallahassee, Florida 32301

(850) 222-2525

(850) 222-5606 (fax)

vkaufman@mac-law.com

Attorneys for Covad Communications Company

#### CERTIFICATE OF SERVICE

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Notice of Service of DIECA Communications, Inc. d/b/a Covad Communications Company's First Set of Interrogatories to BellSouth Telecommunications (Nos. 1-5) and First Request for Production of Documents to BellSouth Telecommunications (No. 1) has been furnished by (\*) hand delivery, (\*\*) electronic mail or U.S. Mail this 20th day of August 2003, to the following:

- (\*) (\*\*) Beth Keating Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850
- (\*\*) Accelerated Connections, Inc. 7337 South "Revere Parkway Englewood, CO 33414
- (\*\*) Jeff Wahlen Ausley Law Firm Post Office Box 391 Tallahassee, Florida 32302
- (\*) (\*\*) Nancy B. White c/o Nancy H. Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, Florida 32301-1556
- (\*\*) Terry Monroe/Genevieve Morelli CompTel 1900 M Street, NW Sutie 800 Washington, DC 20036
- (\*\*) Michael A. Gross
  Florida Cable Telecommunications
  Association, Inc.
  246 East 6th Avenue, Suite 100
  Tallahassee, Florida 32303
- (\*\*) Richard Melson Hopping Law Firm Post Office Box 6526 Tallahassee, Florida 32314

- (\*\*) Nanette S. Edwards ITC DeltaCom 4092 South Memorial Parkway Huntsville, AL 35802-4343
- (\*\*) Donna C. McNulty 1203 Governors Square Boulevard Suite 201 Tallahassee, Florida 32301
- (\*\*) Laura L. Gallagher MediaOne 101 E. College Avenue, Suite 302 Tallahassee, Florida 32301
- (\*\*) Don Sussman Network Access Solutions Corporation Three Dulles Tech Center 13650 Dulles Technology Drive Herndon, VA 20171-4602
- (\*\*) Peter Dunbar Pennington Law Firm Post Office Box 10095 Tallahassee, Florida 32301
- (\*\*) Susan Masterton/Charles Rehwinkel Sprint Communications Company Post Office Box 2214 MC: FLTLHO0107 Tallahassee, Florida 32316-2214
- (\*\*) Ann Shelfer Supra Telecommunications 1311 Executive Center Drive, Suite 200 Tallahassee, Florida 32301

(\*\*) Andrew Isar Telecommunications Resellers Assoc. 7901 Skansie Avenue Suite 240 Gig Harbor, WA 98335

(\*\*) Floyd Self Messer Caparello & Self 215 S. Monroe Street, Suite 701 Tallahassee, FL 32302-1876

(\*\*) Virginia Tate AT&T Communications 1200 Peachtree Street, N.E. Suite 8100 Atlanta, GA 30309

(\*\*) Matthew Feil Florida Digital Network, Inc. 390 North Orange Avenue, Suite 2000 Orlando, Florida 32801

(\*\*) Robert Waldschmidt Howell & Fisher Court Square Building 300 James Robertson Parkway Nashville, TN 37201

(\*\*) Rodney Joyce Shook, Hardy & Bacon LLP 600 14th Street, NW Suite 800 Washington, DC 20005 (\*\*) Richard Chapkis Verizon Select Services, Inc. 201 North Franklin Street Post Office Box 110 MCFLTC0717 Tampa, Florida 33601

Vicki Gordon Kaufmai