### **ORIGINAL**

**Richard Chapkis** 

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September 22, 2003

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

Re:

Docket No. 030867-TL

Petition of Verizon Florida Inc. to Reform Its Intrastate Network Access and Basic Local Telecommunications Rates in Accordance with Florida Statutes, Section 364.164

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of Verizon Florida Inc.'s Notices of Service of Objections and Responses to Citizens' Second Request for Production of Documents (Nos. 37-41) and Second Set of Interrogatories (Nos. 24-39) in the above matters. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-1256.

Sincerely,

Richard M. Chaples

Richard Chapkis

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#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Verizon Florida Inc. to Reform Its Intrastate Network Access and Basic Local Telecommunications Rates in Accordance with Florida Statutes, Section 364.164 Docket No. 030867-TL Filed: September 22, 2003

# NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S OBJECTIONS AND RESPONSES TO CITIZENS' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 37-41)

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Objections and Responses to Citizens' Second Request for Production of Documents (Nos. 37-41), which was legally propounded by Citizens on September 5, 2003, was sent via electronic mail (beck.charles@leg.state.fl.us) on September 22, 2003 and overnight delivery on September 19, 2003 to Charles J. Beck, Interim Public Counsel, 111 W. Madison Street, Room 812, Tallahassee, FL 32399-1400.

The original and one copy of this Notice were sent via overnight delivery on September 19, 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 September 22, 2003.

By:

Richard Chapkis

Post Office Box 110, FLTC0717

Richard M. Chaples

Tampa, Florida 33601

Telephone: 813-483-1256

Attorney for Verizon Florida Inc.

DOCUMENT NUMBER-DATE

FPSC-COMMISSION CLERK

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Verizon Florida Inc. to Reform Its Intrastate Network Access and Basic Local Telecommunications Rates in Accordance with Florida Statutes, Section 364.164

Docket No. 030867-TL Filed: September 22, 2003

## NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S OBJECTIONS AND RESPONSES TO CITIZENS' SECOND SET OF INTERROGATORIES (NOS. 24-39)

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Objections and Responses to Citizens' Second Set of Interrogatories (Nos. 24-39), which was legally propounded by Citizens on September 5, 2003, was sent via electronic mail (beck.charles@leg.state.fl.us) on September 22, 2003, and overnight delivery on September 19, 2003 to Charles J. Beck, Interim Public Counsel, 111 W. Madison Street, Room 812, Tallahassee, FL 32399-1400.

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Respectfully submitted on September 22, 2003.

By:

Richard Chapkis Post Office Box 110, FLTC0717 Tampa, Florida 33601 Telephone: 813-483-1256

Richard A. Charles

Attorney for Verizon Florida Inc.

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Notice of Service and Objections and Responses to Citizens' Second Set of Interrogatories (Nos. 24-39) and Notice of Service of Objections and Responses to Citizens' Second Request for Production of Documents (Nos. 37-41) in Docket No. 030867-TL were sent via electronic mail on September 22, 2003 and overnight delivery on September 19, 2003 to the parties on the attached list.

Richard Chapkis

Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Nancy White c/o Nancy Sims BellSouth Telecomm. Inc. 150 S. Monroe Street, Suite 400 Tallahassee, FL 32301 Tracy Hatch AT&T 101 N. Monroe, Suite 700 Tallahassee, FL 32301

Michael Gross Florida Cable Telecomm. Assn. 246 East 6<sup>th</sup> Avenue Tallahassee, FL 32303 Susan Masterton/Charles Rehwinkel Sprint-Florida 1313 Blairstone Road MC FLTLHO0107 Tallahassee, FL 32301 Donna McNulty MCI WorldCom, Inc. 1203 Governors Square Blvd. Suite 201 Tallahassee, FL 32301-2960

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