

Richard Chapkis

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COMMISSION

October 6, 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. 981834-TP

Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth Telecommunications Inc.'s Service Territory

Docket No. 990321-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

Dear Ms. Bayo:

GCL

OPC MMS

SEC

OTH

RC:tas

Enclosures

Please find enclosed for filing an original and one copy of Verizon Florida Inc.'s Notices of Service of Objections and Responses to Covad's Second Set of Interrogatories (Nos. 6-31) and Second Request for Production of Documents (No. 2) 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.

USSincerely,	RECEIVED & FILED
MP	FPSC-BUREAU OF RECORDS
OM	OF RECORDS
TR ——Richard Chapkis	
CR Thonard Onaphio	

DOCUMENT NUMBER - DATE 09709 OCT -78

#### 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

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: October 6, 2003

## NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S OBJECTIONS AND RESPONSES TO COVAD'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 2)

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida
Inc.'s Responses to Covad's Second Request for Production of Documents (No. 2),
which was legally propounded by Covad on September 15, 2003, was sent via
overnight delivery and electronic mail (vkaufman@mac-law.com) on October 6, 2003, to
Vicki Gordon Kaufman, McWhirter, Reeves, McGlothlin, Davidson, Kaufman & Arnold,
P.A., 117 South Gadsden Street, Tallahassee, FL 32301.

The original and one copy of this Notice were sent via overnight delivery on October 6, 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 October 6, 2003.

By: Richard M. Chaples

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

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Daniel McCuaig
Jonathan Frankel
Wilmer Cutler & Pickering
2445 M Street N.W.
Washington, DC 20037-1420
Telephone: 202-663-6000

Attorneys for Verizon Florida Inc.

#### 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, )
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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: October 6, 2003

# NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S OBJECTIONS AND RESPONSES TO COVAD'S SECOND SET OF INTERROGATORIES (NOS. 6-31)

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida
Inc.'s Objections and Responses to Covad's Second Set of Interrogatories (Nos. 6-31),
which was legally propounded by Covad on September 15, 2003, was sent via
overnight delivery and electronic mail (vkaufman@mac-law.com) on October 6, 2003, to
Vicki Gordon Kaufman, McWhirter, Reeves, McGlothlin, Davidson, Kaufman & Arnold,
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### Respectfully submitted on October 6, 2003.

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Attorneys 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 Covad's Second Set of Interrogatories (Nos. 6-31) and Notice of Service of Objections and Responses to Covad's Second Request for Production of Documents (No. 2) in Docket Nos. 981834-TP and 990321-TP were sent via U.S. mail and electronic mail on October 6, 2003 to the parties on the attached list.

Richard Chapkis

Richard M. Chagels

Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Nancy Sims BellSouth Telecomm. Inc. 150 S. Monroe Street, Suite 400 Tallahassee, FL 32301-1556 Rodney L. Joyce Shook Hardy & Bacon LLP 600 14<sup>th</sup> St NW, Suite 800 Washington, DC 20005-2004

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