

## 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

December 15, 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.:030851-TP

Dear Ms. Bayo:

On behalf of Network Telephone Corporation, enclosed for filing and distribution are the original and 1 copy of the following:

Notice of Service of Network Telephone Corporation's Answers to Staff's First Set of Interrogatories (Nos. 1-7) and Answers to Staff's First Request for Production of Documents (Nos. 1 - 8).

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

Sincerely,

Joseph A. McGlothlin

as MeGlothlen

JAM/bae Enclosures

AUS CAF COMP COM CTR ECR GGL OPC MMS SEC IOTH

RECEIVED & FILED

PSC-BURÉAU OF RECORDS

ORIGINAL

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising

From Federal Communications Commission Triennial UNE review: Local Circuit Switching

For Mass Market Customers

Docket No. 030851-TP

Filed: December 15, 2003

NOTICE OF SERVICE OF NETWORK TELEPHONE CORPORATION'S ANSWERS TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1 – 7) AND ANSWERS TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1 – 8)

Network Telephone Corporation ("Network Telephone") files Notice that it has served its Answers to Staff's First Set of Interrogatories (Nos. 1 - 7) and Answers to Staff's First Request for Production of Documents (Nos. 1 - 8) by e-mail and hand delivery to: Adam Teitzman, Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399, on this 15th day of December 2003.

Joseph A. McGlothlin

McWhirter, Reeves, McGlothlin, Davidson,

Kaufman & Arnold, P.A. 117 South Gadsden Street Tallahassee, Florida 32301

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Attorneys for Network Telephone Corporation

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FPSC-COMMISSION CLERK

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Service of Network Telephone Corporation's Answers to Staff's First Set of Interrogatories (Nos. 1-7) and Answers to Staff's First Request for Production of Documents (Nos. 1-8) has been provided by (\*) hand delivery, (\*\*) email and U.S. Mail this 15th day of December 2003, to the following:

- (\*\*) Adam Teitzman, Staff Counsel Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850
- (\*) (\*\*) Nancy White c/o Nancy Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, Florida 32301-1556
- (\*\*) Richard Chapkis Verizon Florida, Inc. 201 North Franklin Street MC: FLTC0717 Tampa, Florida 33602
- (\*\*) Susan Masterton
  Sprint Communications Company
  1313 Blairstone Road
  Post Office Box 2214
  MC: FLTLHO0107
  Tallahassee, Florida 32301
- (\*\*) Donna Canzano McNulty MCI WorldCom 1203 Governors Square Boulevard Suite 201 Tallahassee, Florida 32301
- (\*\*) Norman H. Horton, Jr. 215 South Monroe Street Tallahassee, Florida 32302-1876
- (\*\*) Tracy Hatch AT&T Communications of the Southern States, LLC 101 North Monroe Street Suite 700 Tallahassee, Florida 32301

- (\*\*) Michael Gross Florida Cable Telecommunications 246 East 6<sup>th</sup> Avenue Tallahassee, Florida 32302
- (\*\*) Matthew Feil Florida Digital Network, Inc. 390 North Orange Avenue, Suite 2000 Orlando, Florida 32801
- (\*\*) Jeffrey J. Binder Allegiance Telecom, Inc. 1919 M Street, NW Washington, DC 20037
- (\*\*) Floyd R. Self Messer, Caparello & Self 215 South Monroe Street, Suite 701 Tallahassee, FL 32301
- (\*\*) Nanette Edwards ITC^DeltaCom 4092 S. Memorial Parkway Huntsville, Alabama 35802
- (\*\*) Jake E. Jennings
  Senior Vice-President
  Regulatory Affairs & Carrier Relations
  NewSouth Communications Corp.
  NewSouth Center
  Two N. Main Center
  Greenville, SC 29601
- (\*\*) Jon C. Moyle, Jr. Moyle, Flanigan, Katz, Raymond & Sheehan, P.A. The Perkins House 118 North Gadsden Street Tallahassee, FL 32301

(\*\*) Rand Currier Geoff Cookman Granite Telecommunications, LLC 234 Copeland Street Quincy, MA

(\*\*) Andrew O. Isar Miller Isar, Inc. 2901 Skansie Avenue, Suite 240 Gig Harbor, WA 98335

(\*\*) Scott A. Kassman FDN Communications 390 North Orange Avenue Suite 2000 Orlando, FL 32801

Joseph A. M. Nothlin