

ORIGINAL



Richard A. Chapkis
Vice President -- General Counsel, Southeast Region
Legal Department

FLTC0007
201 North Franklin Street (33602)
Post Office Box 110
Tampa, Florida 33601-0110

Phone 813 483-1256
Fax 813 204-8870
richard.chapkis@verizon.com

December 22, 2003

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

RECEIVED-FPSC
03 DEC 23 AM 10:47
COMMISSION
CLERK

Re: Docket No. 030852-TP
Implementation of requirements arising from Federal Communications
Commission's triennial UNE Review: Location-Specific Review for DS1, DS3,
and Dark Fiber Loops and Route-Specific Review for DS1, DS3 and Dark Fiber
Transport

Dear Ms. Bayo:

Please find enclosed for filing in the above matter an original and one copy of Verizon
Florida Inc.'s Notices of Service of First Request for Admissions, First Set of
Interrogatories and First Request for Production of Documents to:

1. Allegiance Telecom, Inc.
2. AT&T Communications of the Southern States, LLC
3. Covad Communications Company
4. FDN Communications
5. FPL FiberNet, LLC
6. Intermedia Communications, Inc.
7. KMC Telecom III, LLC
8. Level 3 Communications, LLC
9. MCI WorldCom, Inc.
10. Progress Telecom Corporation
11. SBC Telecom, Inc.
12. TelCove
13. Time Warner Telecom of Florida, L.P.
14. XO Florida, Inc.
15. Xspedius Communications

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
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OTH _____

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

Blanca S. Bayo
December 22, 2003
Page 2

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,

A handwritten signature in black ink that reads "Richard A. Chapkis". The signature is written in a cursive, slightly slanted style.

Richard A. Chapkis

RAC:tas
Enclosures

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail and U. S. mail on December 22, 2003 to:

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 32301-1556

Tracy Hatch
AT&T
101 N. Monroe, Suite 700
Tallahassee, FL 32301

Michael Gross
Florida Cable Telecomm. Assn.
246 East 6th 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

Lisa A. Sapper
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter Reeves Law Firm
117 South Gadsden Street
Tallahassee, FL 32301

Floyd Self
Messer Caparelo & Self
215 S. Monroe Street
Suite 701
Tallahassee, FL 32301

Marva Brown Johnson
KMC Telecom III, LLC
1755 North Brown Road
Lawrenceville, GA 30034-8119

Nanette Edwards
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802

Charles V. Gerkin, Jr.
Allegiance Telecom Inc.
9201 N. Central Expressway
Dallas, TX 75231

Terry Larkin
Allegiance Telecom Inc.
700 East Butterfield Road
Lombard, IL 60148

Matthew Feil
Scott A. Kassman
FDN Communications
390 North Orange Avenue
Suite 2000
Orlando, FL 32801

De O'Roark
MCI WorldCom
6 Concourse Parkway
Suite 600
Atlanta, GA 30328

Norman H. Horton, Jr.
Messer Caparelo & Self
215 S. Monroe Street
Suite 701
Tallahassee, FL 32301

Jake E. Jennings
NewSouth Comm. Corp.
NewSouth Center
Two N. Main Center
Greenville, SC 29601

Jon C. Moyle, Jr.
Moyle Flanigan Law Firm
118 North Gadsden Street
Tallahassee, FL 32301

Jorge Cruz-Bustillo
Supra Telecommunications and Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133

Jonathan Audu
Supra Telecommunications and Information Systems, Inc.
1311 Executive Center Drive, Suite 220
Tallahassee, FL 32301-5027

Bo Russell
Nuvox Communications Inc.
301 North Main Street
Greenville, SC 29601

Thomas M. Koutsky
Z-Tel Communications, Inc.
1200 19th Street, N.W., Suite 500
Washington, DC 20036

Richard A. Chapkis

Richard A. Chapkis

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission's)
triennial UNE Review: Location-Specific)
Review for DS1, DS3, and Dark Fiber Loops)
and Route-Specific Review for DS1, DS3 and)
Dark Fiber Transport)
_____)
Docket No. 030852-TP
December 22, 2003

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),
FIRST SET OF INTERROGATORIES (NOS. 1-21) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO ADELPHIA BUSINESS SOLUTIONS OF JACKSONVILLE, INC. D/B/A TELCOVE**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-21) and First Request for Production of Documents (No. 1-11) on TelCove by electronic mail (jennifer.anderson@telcove.com) and U.S. mail on December 22, 2003 to Jennifer Anderson, TelCove, 712 North Main Street, Coudersport, PA 16915-1768.

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

By: Richard A. Chapkis
RICHARD A. CHAPKIS
201 N. Franklin Street, FLTC0717
P. O. Box 110 (33601)
Tampa, FL 33602
Tel: 813-483-1256
Fax: 813-204-8870
e-mail: richard.chapkis@verizon.com

Attorney for Verizon Florida Inc.

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FT30-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)	Docket No. 030852-TP
from Federal Communications Commission's)	December 22, 2003
triennial UNE Review: Location-Specific)	
Review for DS1, DS3, and Dark Fiber Loops)	
and Route-Specific Review for DS1, DS3 and)	
Dark Fiber Transport)	
_____)	

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),
FIRST SET OF INTERROGATORIES (NOS. 1-21) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO TIME WARNER TELECOM OF FLORIDA, L.P.**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-21) and First Request for Production of Documents (No. 1-11) on Time Warner Telecom of Florida, L.P. by electronic mail (pete@penningtonlawfirm.com) and U.S. mail on December 22, 2003 to Peter Dunbar, Pennington Law Firm, 215 S. Monroe Street, Suite 200, Tallahassee, FL 32301.

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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Docket No. 030852-TP
December 22, 2003

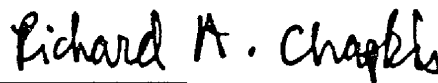
**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),
FIRST SET OF INTERROGATORIES (NOS. 1-21) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO PROGRESS TELECOM CORPORATION**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-21) and First Request for Production of Documents (No. 1-11) on Progress Telecom Corporation by electronic mail (dbranson@progresstelecom.com) and U.S. mail on December 22, 2003 to David Branson, Progress Telecom Corporation, 100 Second Avenue, Suite 400S, St. Petersburg, FL 33701.

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

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e-mail: richard.chapkis@verizon.com

Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Docket No. 030852-TP
December 22, 2003

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FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),
FIRST SET OF INTERROGATORIES (NOS. 1-21) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO SBC TELECOM, INC.**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-21) and First Request for Production of Documents (No. 1-11) on SBC Telecom, Inc. by electronic mail (kevin.chapman@sbc.com) and U.S. mail on December 22, 2003 to Kevin Chapman, SBC Telecom, Inc., 1010 North St. Mary's, Room 13-K, San Antonio, TX 78215-2109.

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

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Fax: 813-204-8870
e-mail: richard.chapkis@verizon.com

Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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from Federal Communications Commission's)
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Docket No. 030852-TP
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**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),
FIRST SET OF INTERROGATORIES (NOS. 1-21) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO FPL FIBERNET, LLC**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-21) and First Request for Production of Documents (No. 1-11) on FPL FiberNet, LLC by electronic mail (sol_stamm@fpl.com) and U.S. mail on December 22, 2003 to Sol Stamm, FPL FiberNet, LLC, P. O. Box 025566, Miami, FL 33102-5566.

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

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e-mail: richard.chapkis@verizon.com

Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Docket No. 030852-TP
December 22, 2003

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),
FIRST SET OF INTERROGATORIES (NOS. 1-21) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO XO FLORIDA, INC.**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-21) and First Request for Production of Documents (No. 1-11) on XO Florida, Inc. by electronic mail (vkaufman@mac-law.com) and U.S. mail on December 22, 2003 to Joseph A. McGlothlin and Vicki Gordon Kaufman, McWhirter Reeves Law Firm, 117 South Gadsden Street, Tallahassee, FL 32301.

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

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Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Docket No. 030852-TP
Filed: December 22, 2003

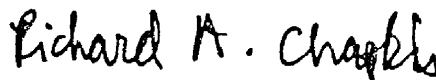
**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),
FIRST SET OF INTERROGATORIES (NOS. 1-23) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO ALLEGIANCE TELECOM, INC.**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-23) and First Request for Production of Documents (No. 1-11) on Allegiance Telecom, Inc. by electronic mail (charles.gerkin@algx.com) and U.S. mail on December 22, 2003 to Charles V. Gerkin, Jr., Allegiance Telecom, Inc., 9201 N. Central Expressway, Dallas, TX 75231.

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

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P. O. Box 110 (33601)
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Fax: 813-204-8870
e-mail: richard.chapkis@verizon.com

Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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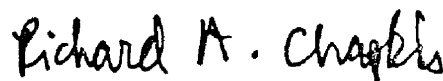
**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),
FIRST SET OF INTERROGATORIES (NOS. 1-22) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO DIECA COMMUNICATIONS, INC. D/B/A COVAD COMMUNICATIONS COMPANY**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-22) and First Request for Production of Documents (No. 1-11) on Covad Communications Company by electronic mail (vkaufman@mac-law.com) and U.S. mail on December 22, 2003 to Joseph A. McGlothlin and Vicki Gordon Kaufman, McWhirter Reeves Law Firm, 117 South Gadsden Street, Tallahassee, FL 32301.

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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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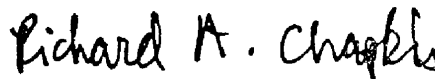
**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),
FIRST SET OF INTERROGATORIES (NOS. 1-24) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-24) and First Request for Production of Documents (No. 1-11) on AT&T by electronic mail (thatch@att.com) and U.S. mail on December 22, 2003 to Tracy Hatch, AT&T Communications of the Southern States, LLC, 101 N. Monroe Street, Suite 700, Tallahassee, FL 32301.

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

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Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),
FIRST SET OF INTERROGATORIES (NOS. 1-22) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO KMC TELECOM III, LLC**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-22) and First Request for Production of Documents (No. 1-11) on KMC Telecom III, LLC by electronic mail (marva.johnson@kmctelecom.com) and U.S. mail on December 22, 2003 to Marva Brown Johnson, KMC Telecom III, LLC, 1755 North Brown Road, Lawrenceville, GA 30034-8119.

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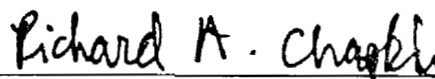
**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),
FIRST SET OF INTERROGATORIES (NOS. 1-21) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO FDN COMMUNICATIONS**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-21) and First Request for Production of Documents (No. 1-11) on FDN Communications by electronic mail (mfeil@mail.fdn.com) and U.S. mail on December 22, 2003 to Matthew Feil, FDN Communications, 390 North Orange Avenue, Suite 2000, Orlando, FL 32801.

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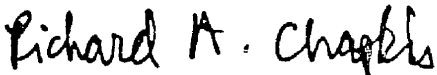
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FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO XSPEDIUS COMMUNICATIONS, LLC
D/B/A XSPEDIUS COMMUNICATIONS**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-21) and First Request for Production of Documents (No. 1-11) on Xspedius Communications by electronic mail (nhorton@lawfla.com) and U.S. mail on December 22, 2003 to Norman H. Horton, Jr., Messer Caparello & Self, 215 S. Monroe Street, Suite 701, Tallahassee, FL 32301.

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Attorney for Verizon Florida Inc.

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FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO MCI WORLDCOM, INC.**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-21) and First Request for Production of Documents (No. 1-11) on MCI WorldCom, Inc. by electronic mail (donna.mcnulty@mci.com) and U.S. mail on December 22, 2003 to Donna McNulty, MCI WorldCom, Inc., 1203 Governors Square Boulevard, Suite 201, Tallahassee, FL 32301.

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

By: 
RICHARD A. CHAPKIS
201 N. Franklin Street, FLTC0717
P. O. Box 110 (33601)
Tampa, FL 33602
Tel: 813-483-1256
Fax: 813-204-8870
e-mail: richard.chapkis@verizon.com

Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission's)
triennial UNE Review: Location-Specific)
Review for DS1, DS3, and Dark Fiber Loops)
and Route-Specific Review for DS1, DS3 and)
Dark Fiber Transport)
_____)
Docket No. 030852-TP
December 22, 2003

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),
FIRST SET OF INTERROGATORIES (NOS. 1-21) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO INTERMEDIA COMMUNICATIONS, INC.**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-21) and First Request for Production of Documents (No. 1-11) on Intermedia Communications by electronic mail (donna.mcnulty@mci.com) and U.S. mail on December 22, 2003 to Donna McNulty, MCI WorldCom, Inc., 1203 Governors Square Boulevard, Suite 201, Tallahassee, FL 32301.

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

By: Richard A. Chapkis
RICHARD A. CHAPKIS
201 N. Franklin Street, FLTC0717
P. O. Box 110 (33601)
Tampa, FL 33602
Tel: 813-483-1256
Fax: 813-204-8870
e-mail: richard.chapkis@verizon.com
Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission's)
triennial UNE Review: Location-Specific)
Review for DS1, DS3, and Dark Fiber Loops)
and Route-Specific Review for DS1, DS3 and)
Dark Fiber Transport)
_____)
Docket No. 030852-TP
December 22, 2003

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),
FIRST SET OF INTERROGATORIES (NOS. 1-21) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)
TO LEVEL 3 COMMUNICATIONS, LLC**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-21) and First Request for Production of Documents (No. 1-11) on Level 3 Communications by electronic mail (mike.romano@level3.com) and U.S. mail on December 22, 2003 to Mike Romano, Level 3 Communications, 1025 Eldorado Boulevard, Broomfield, CO 80021-8869.

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

By:

Richard A. Chapkis

RICHARD A. CHAPKIS
201 N. Franklin Street, FLTC0717
P. O. Box 110 (33601)
Tampa, FL 33602
Tel: 813-483-1256
Fax: 813-204-8870
e-mail: richard.chapkis@verizon.com

Attorney for Verizon Florida Inc.