



ORIGINAL

RECEIVED-FPSC

03 DEC 31 AM 11:19

COMMISSION CLERK

December 30, 2003

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

via Overnight Mail

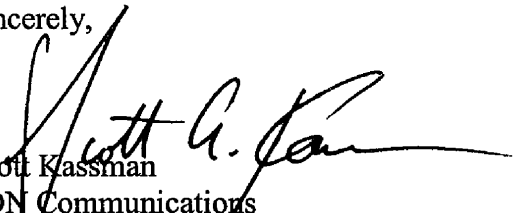
Re: Docket No. 030852-TP Implementation of Requirements Arising from FCC
Triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber
Loops, Route-Specific Review for DS1, DS3 and Dark Fiber Transport

Dear Ms. Bayo:

Enclosed please find an original and seven (7) copies of FDN Communications
Objections and Responses to Staff's First Set of Interrogatories (Nos. 1-14), and Staff's
First Request for Production of Documents (Nos. 1-7).

If you have any questions regarding the enclosed, please call me at 407-447-6636.

Sincerely,


Scott Kassman
FDN Communications
Assistant General Counsel

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC I
- OTH _____

LOCAL

LONG DISTANCE

390 North Orange Avenue Suite 2000 Orlando, FL 32801
407.835.0300 Fax 407.835.0309 www.fdn.com

DOCUMENT SUBJECT-DATE

13606 DEC 31 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

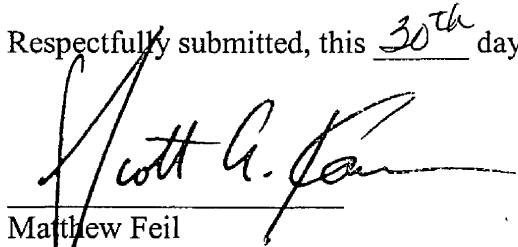
In re: Implementation of requirements arising from Federal Communications Commission's Triennial UNE review: Location Specific-Review for DS1, DS3, and Dark Fiber Loops and Route-Specific Review for DS1, DS3, and Dark Fiber Transport.

DOCKET NO. 030852-TP

FLORIDA DIGITAL NETWORK, INC.'S OBJECTIONS AND RESPONSES TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1 - 14) AND STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1 - 7)

Florida Digital Network, Inc. d/b/a FDN Communications, ("FDN") hereby provides notice that it has served its objections and responses to Staff's First Set of Interrogatories (Nos. 1 – 14) and Staff's First Request for Production of Documents (Nos. 1-7) to the parties to this docket.

Respectfully submitted, this 30th day of December 2003.



Matthew Feil
Scott Kassman
FDN Communications
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
407-835-0460
mfeil@mail.fdn.com
skassman@mail.fdn.com

DOCUMENT NUMBER DATE

13606 DEC 31 8

FPSC-COMMUNICATIONS SECTION

CERTIFICATE OF SERVICE
Docket 030852-TP

I hereby certify that a copy of the foregoing was sent by e-mail and regular mail to the persons listed below, other than those marked with an (*) who have been sent a copy via overnight mail, this 30th day of December, 2003.

BellSouth Telecommunications, Inc.
R. Lackey/M. Mays/N. White/J. Meza/A. Shore
c/o Ms. Nancy H. Sims
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556
nancy.sims@bellsouth.com
linda.hobbs@bellsouth.com
chantel.stevens@bellsouth.com
douglas.lackey@bellsouth.com
meredith.mays@bellsouth.com
nancy.white@bellsouth.com

Mr. Adam Teitzman/Jason Rojas
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
ateitzma@psc.state.fl.us
jrojas@psc.state.fl.us
jsusac@psc.state.fl.us
wgarcia@psc.state.fl.us
vmckay@psc.state.fl.us

McWhirter Law Firm
Vicki Kaufman/Joseph McGlothlin
117 South Gadsden Street
Tallahassee, FL 32301
vkaufman@mac-law.com

Covad Communications Company
Mr. Charles E. Watkins
1230 Peachtree Street, N.E.
19th Floor
Atlanta, GA 30309-3574
gwatkins@covad.com

Verizon Florida, Inc.
Richard Chapkis/Kimberly Caswell
One Tampa City Center
201 North Franklin Street (33602)
P.O. Box 110, FLTC 0007
Tampa, FL 33601-0110
Richard.chapkis@verizon.com

Florida Cable Telecom Assoc., Inc.
Michael A. Gross
246 East 6th Avenue
Suite 100
Tallahassee, FL 32303
mgross@fcta.com

AT&T Communications of the
Southern States, LLC
Ms. Lisa A. Sapper
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, GA 30309-3579
lisariley@att.com

AT&T
Tracy Hatch
101 North Monroe Street
Suite 700
Tallahassee, FL 32301-1549
thatch@att.com

ITC DeltaCom
Ms. Nanette S. Edwards
4092 South Memorial Parkway
Huntsville, AL 35802-4343
nedwards@itcdeltacom.com

KMC Telecom III, LLC
Marva Brown Johnson, Esq.
1755 North Brown Road
Lawrenceville, GA 30043-8119
marva.johnson@kmctelecom.com

Messer Law Firm
Floyd Self/Norman Horton
P.O. Box 1876
Tallahassee, FL 32302-1876
fsself@lawfla.com
nhorton@lawfla.com

Sprint Communications Corp. (FL)
Susan Masterton
P.O. Box 2214
Tallahassee, FL 32316-2214
susan.masterton@mail.sprint.com

Allegiance Telecom, Inc.
Charles Gerkin, Jr., Esq.
9201 N Central Expressway
Dallas, TX 75231
Charles.gerkin@algx.com

Moyle Law Firm
Jon Moyle, Jr.
The Perkins House
118 N Gadsden Street
Tallahassee, FL 32301
jmoylejr@moylelaw.com

Florida Competitive Carriers Assoc
C/O McWhirter Law Firm
Joseph McGlothlin/Vicki Kaufman
117 South Gadsden Street
Tallahassee, FL 32301
jmcglathlin@mac-law.com

MCI WorldCom Communications, Inc.
Ms. Donna C. McNulty
1203 Governors Square Boulevard
Suite 201
Tallahassee, FL 32301-2960
donna.mcnulty@mci.com

MCI WorldCom Communications, Inc.
De O'Roark, Esq.
Six Concourse Parkway
Suite 600
Atlanta, GA 30328
de.oroark@wcom.com

Xspedius Communications
Ms. Rabinai E. Carson
5555 Winghamen Boulevard
Suite 300
O'Fallon, MO 63366-3868
rabinai.carson@xspedius.com

Allegiance Telecom, Inc. (IL)
Theresa Larkin
700 East Butterfield Road
Suite 400
Lombard, IL 60148
Terry.larkin@algx.com

Access Integrated Networks, Inc.
Mr. Mark Ozanick
4885 Riverside Drive
Suite 107
Macon, GA 31210-1148
mark.ozanick@accesscomm.com

NewSouth Communications Corp.
Jake E. Jennings/Keiki Hendrix
Two North Main Center
Greenville, SC 29601-2719
jejennings@newsouth.com
khendrix@newsouth.com

Casey & Genta, LLP
Bill Magness
919 Congress Avenue
Suite 1060
Austin, TX 78701

Nuvox Communications, Inc.
Bo Russell
301 North Main Street
Greenville, SC 29601-2171

Phone Club Corporation
Carlos Jordan
168 SE First Street
Suite 705
Miami, FL 33131-1423
phoneclubcorp@aol.com

Sprint (NC)
H. Edward Phillips, III
14111 Capital Boulevard
Mailstop: NCWKFR0313-3161
Wake Forest, NC 27587-5900

Tier 3 Communications
Kim Brown
2235 First Street
Suite 217
Ft. Meyers, FL 33901
steve@tier3communications.net

Universal Telecom, Inc.
Jennifer Hart
PO Box 679
LaGrange, KY 40031-0679
jenniferh@universaltelecomin.com

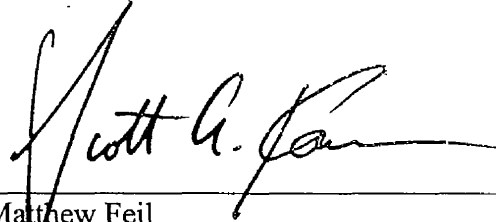
BellSouth BSE, Inc.
Mr. Mario L. Soto
North Terraces Building
400 Perimeter Center Terrace, Suite 400
Atlanta, GA 30346-1231
Mario.soto@bellsouth.com

Comm South Companies, Inc.
Sheri Pringle
PO Box 570159
Dallas, TX 75357-9900
springle@commsouth.net

Sprint (KS)
Kenneth A. Schiffman
6450 Sprint Parkway
Mailstop: KSOPHN0212-2A303
Overland Park, KS 66251-6100

Supra Telecommunications & Information
Systems, Inc. (MIA)
Jorge Cruz-Bustillo, Esq.
2620 SW 27th Avenue
Miami, FL 33133-3005
Jorge.cruz-bustillo@stis.com

Supra Telecommunications & Information
Systems, Inc.
Jonathan Audu
1311 Executive Center Drive
Suite 220
Tallahassee, FL 32301-5027
jonathan.audu@stis.com



Matthew Feil
Scott A. Kassman
FDN Communications
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
(407) 835-0460
(407) 447-6636
mfeil@mail.fdn.com
skassman@mail.fdn.com