

ORIGINAL



Susan S. Masterton  
Attorney

Law/External Affairs  
Post Office Box 2214  
1313 Blair Stone Road  
Tallahassee, FL 32316-2214  
Mailstop FTLH00107  
Voice 850 599 1560  
Fax 850 878 0777  
susan.masterton@mail.sprint.com

January 13, 2004

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

RECEIVED-FPSC  
JAN 13 PM 4:49  
COMMISSION  
CLERK

Re: Docket No. 030851-TP & 030852-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint-Florida, Incorporated and Sprint Communications Limited Partnership are the original and 15 copies of Sprint's Notice of Service of Sprint's Second Request for Production of Documents (Nos. 28-30) to BellSouth in Docket No. 030851-TP and Sprint's Notice of Service of Sprint's First Request for Production of Documents (Nos. 1-3) to BellSouth in Docket No. 030852-TP and the original and 15 copies of Sprint's Motion to Compel.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to my assistant. If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Susan S. Masterton

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM 57 (Masterton) Enclosure
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- SEC 1
- OTH \_\_\_\_\_

<i>Notice of Service</i>	<i>Motion to Compel</i>
DOCUMENT NUMBER-DATE	DOCUMENT NUMBER-DATE
00559 JAN 13 3	00560 JAN 13 3
FPSC-COMMISSION CLERK	FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 030851-TP & 030852-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic and U.S. mail this 13<sup>th</sup> day of January, 2004 to the following:

AT&T  
Tracy Hatch (+)  
101 North Monroe Street, Suite  
700  
Tallahassee, FL 32301-1549

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

BellSouth Telecommunications,  
Inc.  
R. D. Lackey/M. Mays (+)/N.  
White/J. Meza  
c/o Ms. Nancy H. Sims  
150 South Monroe Street, Suite  
400  
Tallahassee, FL 32301-1556

Covad Communications  
Company  
Mr. Charles E. Watkins  
1230 Peachtree Street, NE, 19th  
Floor  
Atlanta, GA 30309-3574

FDN Communications  
Matthew Feil/Scott Kassman(+)  
390 North Orange Avenue, Suite  
2000  
Orlando, FL 32801-1640

Florida Cable  
Telecommunications Assoc., Inc.  
Michael A. Gross  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303

ITC DeltaCom  
Nanette Edwards  
4092 South Memorial Parkway  
Huntsville, AL 35802

KMC Telecom III, LLC  
Marva Brown Johnson, Esq.  
1755 North Brown Road  
Lawrenceville, GA 30043-8119

McWhirter Law Firm  
Vicki Kaufman  
117 S. Gadsden St.  
Tallahassee, FL 32301

Messer Law Firm  
Floyd Self (+)  
P.O. Box 1876  
Tallahassee, FL 32302-1876

Verizon Florida Inc.  
Richard Chapkis (+)  
P.O. Box 110, FLTC0717  
Tampa, FL 33601-0110

Florida Public Service  
Commission  
Adam Tietzman/ Jeremy Susac  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Allegiance Telecom of Florida,  
Inc.  
Charles V. Gerkin, Jr. (+)  
9201 N. Central Expressway  
Dallas, TX 75231

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

Florida Competitive Carriers  
Assoc.  
c/o McWhirter Law Firm  
Joseph McGlothlin/Vicki  
Kaufman  
117 S. Gadsden St.  
Tallahassee, FL 32301

MCI WorldCom  
Communications, Inc.(GA)  
De O'Roark, Esq.  
Six Concourse Parkway, Suite  
3200  
Atlanta, GA 30328

Xspedius Communications  
Ms. Rabinai E. Carson  
5555 Winghaven Blvd., Suite  
300  
O'Fallon, MO 63366-3868  
Phone: (301) 361-4220

Granite Telecommunications,  
LLC  
Rand Currier/Geoff Cookman  
234 Copeland Street  
Quincy, MA 02169-4005

MCI WorldCom  
Communications, Inc.  
Ms. Donna C. McNulty (+)  
1203 Governors Square Blvd.,  
Suite 201  
Tallahassee, FL 32301-2960

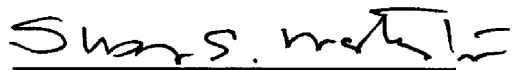
Miller Isar, Inc.  
Andrew O. Isar  
7901 Skansie Avenue, St. 240  
Gig Harbor, WA 98335

NewSouth Communications  
Jake E. Jennings  
Regulatory Affairs & Carrier  
Relations  
Two N. Main Center  
Greenville, SC 29601

Moyle, Flanigan, Katz Raymond  
& Sheehan, P.A.  
Jon C. Moyle, Jr., Esq.  
The Perkins House  
118 N. Gadsen St.  
Tallahassee, FL 32301

Nuvox Communications, Inc.  
Bo Russell, Vice-President  
Regulatory & Legal Affairs  
301 N. Main St.  
Greenville, SC 29601

Messer Law Firm  
Norman Horton  
P.O. Box 1876  
Tallahassee, FL 32302-1876

  
Susan S. Masterton

(+ Signed Protective Agreement)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising ) Docket No. 030851-TP  
From Federal Communications Commission )  
Triennial UNE review: Local Circuit Switching )  
For Mass Market Customers )

In re: Implementation of requirements arising ) Docket No. 030852-TP  
from Federal Communications Commission's )  
triennial UNE review: Location-Specific ) Filed: January 13, 2004  
Review for DS1, DS3, and Dark Fiber Loops )  
Route-Specific Review for DS1, DS3, and )  
Dark Fiber Transport )

**NOTICE OF SERVICE OF SPRINT'S SECOND REQUEST FOR PRODUCTION  
OF DOCUMENTS (NOS. 28-31) TO BELLSOUTH TELECOMMUNICATIONS,  
INC. IN DOCKET NO. 030851-TP AND FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS (NOS. 1-3) TO BELLSOUTH TELECOMMUNICATIONS,  
INC. IN DOCKET NO. 030852-TP**

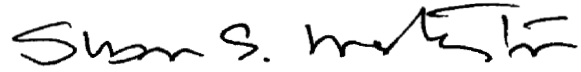
Sprint Communications Company Limited Partnership and Sprint-Florida, Incorporated (Collectively "Sprint"), pursuant to Rule 1.350, Florida Rules of Civil Procedure and Rule 28-106.206, F.A.C., hereby gives NOTICE that it has served its Second Request for Production of Documents (Nos. 28-31) to BellSouth in Docket No. 030851-TP, and First Request for Production of Documents (Nos. 1-3) to BellSouth which are to be made available for inspection and copying in the offices of Sprint, 1313 Blair Stone Road, Tallahassee, Florida.

DOCUMENT NUMBER-DATE

00559 JAN 13 3

FPSC-COMMISSION CLERK

RESPECTFULLY SUBMITTED this 13<sup>th</sup> day of January 2004



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Susan S. Masterton

P.O. Box 2214

Tallahassee, FL 32316-2214

850-599-1560 (phone)

850-878-0777 (fax)

[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

ATTORNEY FOR SPRINT