ORIGINAL

LAW OFFICES

Messer, Caparello & Self

A Professional Association

Post Office Box 1876
Tallahassee, Florida 32302-1876
Internet: www.lawfla.com

CHUMN 26 PM 4: 04
CHUMN 25 PM 4: 04

January 26, 2004

BY HAND DELIVERY

Ms. Blanca Bayó, Director Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re:

Docket No. 030852-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. are an original and one copy of MCI's Notice of Service of Responses and Objections, and Request for Protective Order, to Staff's First Set of Interrogatories and First Request for Production of Documents in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Floyd R. Self

FRS/amb Enclosures

AUS

CAF CMP COM

CTR

GCL

OPC MMS SEC cc: Parties of Record

DOCUMENT NUMBER-DAT

01128 JAN 26 3

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Implementation of Requirements)	
Arising From Federal Communications)	
Commission Triennial UNE Review:)	
Location Specific Review For DS1, DS3,).	Docket No.: 030852-TP
and Dark Fiber Loops And Route-Specific)	Filed: January 26, 2004
Review for DS1, DS3, And Dark Fiber)	•
Transport)	

MCIMETRO ACCESS TRANSMISSION SERVICES, LLC AND MCI WORLDCOM COMMUNICATIONS, INC.'S NOTICE OF SERVICE OF ITS RESPONSES AND OBJECTIONS, AND REQUEST FOR PROTECTIVE ORDER, TO STAFF'S FIRST SET OF INTERROGATORIES (Nos. 1-14) AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 1-7)

MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. by and through its undersigned counsel, hereby files and serves Notice that it has served its Responses and Objections, and Request for Protective Order, to Staff's First Set of Interrogatories (Nos. 1-14) and First Request for Production of Documents (Nos. 1-7) by electronic mail on Adam Teitzman at ateitzma@psc.state.fl.us andd by Hand Delivery to Adam Teitzman, Esq., Office of General Counsel, Florida Public Service Commission, 2540 Shumard Oak Blvd., Room 370, Tallahassee, Florida 32399-0850 on this 26th day of January, 2004.

Respectfully submitted,

Floyd Self, Esq.

Messer, Caparelld & Self, P.A.

215 S. Monroe Street, Suite 701

Tallahassee, FL 32302

(850) 222-0720

and

De O'Roark, Esq.

MCI

6 Concourse Parkway, Suite 600

Atlanta, GA 30328

Donna McNulty, Esq.

MCI

1203 Governors Square Blvd, Suite 201

Tallahassee, FL 32301-2960

Attorneys for MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery (*), electronic mail, and/or U. S. Mail this 26th day of January, 2004.

Adam Teitzman, Esq.*
Office of General Counsel, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Jason Rojas, Esq.*
Office of General Counsel, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy B. White c/o Nancy H. Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, FL 32301

Susan S. Masterton, Esq.
Sprint-Florida, Incorporated
Sprint Communications Company Limited
Partnership
P.O. Box 2214
Tallahassee, FL 32316-2214

Richard A. Chapkis, Esq. Verizon Florida Inc. P.O. Box 110, FLTC0007 Tampa, FL 33601-0110

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

Mr. James White ALLTEL 601 Riverside Avenue Jacksonville FL 32204-2987

Ms. Laurie A. Maffett Frontier Telephone Group 180 South Clinton Avenue Rochester NY 14646-0700

Mr. R. Mark Ellmer GT Com P. O. Box 220 Port St. Joe FL 32457-0220

Mr. Robert M. Post, Jr.
ITS Telecommunications Systems, Inc.
P. O. Box 277
Indiantown FL 34956-0277

Ms. Harriet Eudy NEFCOM 11791 110th Street Live Oak FL 32060-6703

Ms. Lynn B. Hall Smart City Telecom P. O. Box 22555 Lake Buena Vista FL 32830-2555

Michael A. Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecommunications Assoc., Inc.
246 E. 6th Avenue
Tallahassee, FL 32301

Tracy W. Hatch, Esq.
AT&T Communications of the Southern States, LLC 101 N. Monroe Street, Suite 701 Tallahassee, FL 32301

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

Donna McNulty, Esq.
MCI WorldCom Communications, Inc.
1203 Governors Square Blvd, Suite 201
Tallahassee, FL 32301-2960

De O'Roark, Esq. MCI WorldCom Communications, Inc. 6 Concourse Parkway, Suite 600 Atlanta, GA 30328

Vicki Kaufman, Esq. Joe McGlothlin, Esq. McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. 117 S. Gadsden Street Tallahassee, FL. 32301

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

James C. Falvey, Esq. Senior Vice President, Regulatory Affairs Xspedius Communications, LLC 7125 Columbia Gateway Drive, Suite 200 Columbia, MD 21046 Norman H. Horton, Jr. Messer, Caparello & Self, P.A. P.O. Box 1876 Tallahassee, FL 32302-1876

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

Jon C. Moyle, Jr., Esq. Moyle, Flanigan, Katz, Raymond & Sheehan, P.A. 118 North Gadsden Street Tallahassee, FL 32301

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

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

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

Mr. Jonathan AuduSupra Telecommunications and Information Systems, Inc.1311 Executive Center Drive, Suite 220 Tallahassee, FL 32301

Mr. Bo Russell Vice President Regulatory and Legal Affairs Nuvox Communications, Inc. 301 North Main Street Greenville, SC 29601

Thomas M. Koutsky Vice president, Law and Public Policy Z-Tel Communications, Inc. 1200 19th Street, N.W., Suite 500 Washington, DC 20036

Charles Beck
Office of the Public Counsel
111 W. Madison St., Room 812
Tallahasses, FL 32399-1400

Floyd K. Self