

LAW OFFICES

Messer, Caparello & Self

05 JAN 28 PH 3: 02

RECEIVED-FPSC

A Professional Association

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

COMMISSION CLERK

January 28, 2005

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. 041144-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of KMC Telecom III LLC, KMC Telecom V, Inc. and KMC Data LLC are an original and one copy of KMC's Notice of Serving their Second Request for Production of Documents (No. 23) on Sprint-Florida, Incorporated 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.

CMP_	Thank y	you for your assista	nce with this filing.	
COM_		, 0 11 101	_	
CTR			Sincerely you	rs,
ECR			Or made	MALL
GCL			Floyd R. Self	NO NO WOLL
OPC			Doc.	
MMS	FRS/amb Enclosures		V	
RCA	cc: Parties	of Record		
SCR				
SEC 📗		RECEIVED & FIL	.EU	
OTH +ca	over Hr.		ac prooppo	
		FPSC-BUREAU	OF KECOKD2	

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint against KMC Telecom III LLC,)	
KMC Telecom V, Inc., and KMC Data LLC)	
for alleged failure to pay intrastate access charges)	Docket No. 041144-TP
pursuant to its interconnection agreement and)	Filed: January 28, 2005
Sprint's tariffs and for alleged violation of Section)	
364.16(3)(a), F.S., by Sprint-Florida, Incorporated)	
)	

NOTICE OF SERVING KMC TELECOM III LLC, KMC TELECOM V, INC., AND KMC DATA LLC'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 23) ON SPRINT-FLORIDA, INCORPORATED

KMC Telecom III LLC, KMC Telecom V, Inc., and KMC Data LLC (collectively "KMC"), by and through its undersigned counsel, hereby files and serves Notice that it has served its Second Request for Production of Documents (No. 23) on Sprint-Florida, Incorporated by e-mail on Susan S. Masterton, Esq. at susan.masterton@mail.sprint.com and U. S. Mail on Susan Masterton, Esq., Sprint-Florida Incorporated, P.O. Box 2214, Tallahassee, FL 32316-2214 on this 28th day of January, 2005.

Respectfully submitted,

Floyd R. Self, Esq.

MESSER, CAPARELLO & SELF, P.A. 215 South Monroe Street, Suite 701 Tallahassee, Florida, 32301

Tallahassee, Florida 32301 (850) 222-0720 (voice)

(850) 224-4359 (facsimile)

fself@lawfla.com

Edward A. Yorkgitis, Jr.
KELLEY DRYE & WARREN LLP
1200 19th Street, N.W., Fifth Floor
Washington, D.C. 20036
(202) 955-9600 (voice)
(202) 955-9792 (facsimile)
cvorkgitis@kelleydrye.com

Marva Brown Johnson KMC Telecom Holdings, Inc. 1755 North Brown Road Lawrenceville, GA 30043 (678) 985-6220 (voice) (678) 985-6213 (facsimile) marva.johnson@kmctelecom.com

Attorneys for KMC Telecom III, LLC, KMC Telecom V, Inc., and KMC Data LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing have been served upon the following parties by hand delivery (*), electronic mail (**) and/or U.S. Mail this 28th day of January, 2005.

Lee Fordham, Esq.* General Counsel's Office, Room 370 Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Dovie L. Rockette-Gray* General Counsel's Office, Room 370 Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Ms. Nancy Pruitt*
Division of Competitive Markets and Enforcement
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Susan Masterton, Esq.**
Sprint-Florida, Incorporated
1313 Blair Stone
Tallahassee, FL 32301

_Floyd/R. Self