

**Dorothy Menasco**

**From:** Cooper, Roberta G [Roberta.G.Cooper@CenturyLink.com]  
**Sent:** Monday, March 19, 2012 2:26 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Masterton, Susan S; Sherr, Adam  
**Subject:** 090538 QCC Notice of Service-Broadwing  
**Attachments:** 090538 QCC Notice of Service Broadwing 3-19-12.pdf

Filed on Behalf of: Susan S. Masterton  
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 CenturyLink QCC  
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Docket No. 090538

Title of filing: CenturyLink QCC's Notice of Service of Objections and Responses to Broadwing Communications, LLC's First Set of Interrogatories (Nos. 1-18), Second Request for Production of Documents (Nos. 4-21) and First Request for Admissions (Nos. 1-4)

Filed on behalf of: CenturyLink QCC

No of pages: 4

Description: CenturyLink QCC's Notice of Service of Objections and Responses to Broadwing Communications, LLC's First Set of Interrogatories (Nos. 1-18), Second Request for Production of Documents (Nos. 4-21) and First Request for Admissions (Nos. 1-4)

**Roberta Cooper**

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DOCUMENT NUMBER DATE

01646 MAR 19 2012

FPSC-COMMISSION CLERK

3/19/2012



March 19, 2012

**VIA ELECTRONIC FILING**

Ms. Ann Cole, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 090538-TP - Amended Complaint of QWEST COMMUNICATIONS COMPANY, LLC, Against MCIMETRO ACCESS TRANSMISSION SERVICES, LLC (D/B/A VERIZON ACCESS TRANSMISSION SERVICES), XO COMMUNICATIONS SERVICES, INC., TW TELECOM OF FLORIDA, L.P., GRANITE TELECOMMUNICATIONS, LLC, BROADWING COMMUNICATIONS, LLC, ACCESS POINT, INC., BIRCH COMMUNICATIONS, INC., BUDGET PREPAY, INC., BULLSEYE TELECOM, INC., DELTACOM, INC., ERNEST COMMUNICATIONS, INC., FLATEL, INC., LIGHTYEAR NETWORK SOLUTIONS, LLC, NAVIGATOR TELECOMMUNICATIONS, LLC, PAETEC COMMUNICATIONS, INC., STS TELECOM, LLC, US LEC OF FLORIDA, LLC, WINDSTREAM NUVOX, INC., AND JOHN DOES 1 THROUGH 50, for unlawful discrimination**

Dear Ms. Cole:

Enclosed for filing in the above-referenced docket please find Qwest Communications Company, LLC, d/b/a CenturyLink QCC's Notice of Service of Objections and Responses to Broadwing Communications, LLC ("Broadwing") First Set of Interrogatories (Nos. 1-18), Second Request for Production of Documents (Nos. 4-21) and First Request for Admissions (Nos. 1-4).

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

Sincerely,

/s/ Susan S. Masterton  
Susan S. Masterton

Enclosures

**SUSAN S. MASTERTON**  
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DOCUMENT NUMBER - DATE

01646 MAR 19 02

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Amended Complaint of Qwest Communications Company, LLC against MCImetro Access Transmission Services (d/b/a Verizon Access Transmission Services); XO Communications Services, Inc.; tw telecom of florida, l.p.; Granite Telecommunications, LLC; Broadwing Communications, LLC; Access Point, Inc.; Birch Communications, Inc.; Budget Prepay, Inc.; Bullseye Telecom, Inc.; DeltaCom, Inc.; Ernest Communications, Inc.; Flatel, Inc.; Lightyear Network Solutions, LLC; Navigator Telecommunications, LLC; PaeTec Communications, Inc.; STS Telecom, LLC; US LEC of Florida, LLC; Windstream Nuvox, Inc.; and John Does 1 through 50, for unlawful discrimination.

DOCKET NO. 090538-TP

DATED: March 19, 2012

**QWEST COMMUNICATIONS COMPANY, LLC'S NOTICE OF SERVICE**

Qwest Communications Company, LLC, d/b/a CenturyLink QCC ("QCC"), serves notice that, by and through its undersigned counsel, it has served its Objections and Responses to Broadwing Communications, LLC ("Broadwing") First Set of Interrogatories (Nos. 1-18), Second Request for Production of Documents (Nos. 4-21) and First Request for Admissions (Nos. 1-4) by U.S. Mail to Marsha Rule, 119 South Monroe Street, Suite 202, Tallahassee, FL 32301 and electronically at [marsha@reuphlaw.com](mailto:marsha@reuphlaw.com) on this 19<sup>th</sup> day of March, 2012.

/s/ Susan S. Masterton  
Susan S. Masterton  
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ATTORNEYS FOR QWEST COMMUNICATIONS  
COMPANY, LLC D/B/A CENTURYLINK QCC

DOCUMENT NUMBER-DATE

01646 MAR 19 2012

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**CERTIFICATE OF SERVICE  
DOCKET NO. 090538-TP**

I hereby certify that a true and correct copy of the foregoing has been served upon the following by electronic mail delivery and/or U.S. Mail this 19<sup>th</sup> day of March, 2012.

<p>Florida Public Service Commission Theresa Tan Office of General Counsel 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <a href="mailto:ltan@psc.state.fl.us">ltan@psc.state.fl.us</a></p>	<p>Division of Regulatory Analysis Brenda Merritt Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 <a href="mailto:bmerritt@psc.state.fl.us">bmerritt@psc.state.fl.us</a></p>
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<p>BullsEye Telecom, Inc. David Bailey 25925 Telegraph Road, Suite 210 Southfield, MI 48033-2527 <a href="mailto:dbailey@bullseyetelecom.com">dbailey@bullseyetelecom.com</a></p>	<p>Broadwing Communications, LLC Rutledge Law Firm Marsha E. Rule P.O. Box 551 Tallahassee, FL 32302-0551 <a href="mailto:marsha@reuphlaw.com">marsha@reuphlaw.com</a></p>
<p>Granite Telecommunications, LLC 100 Newport Avenue Extension Quincy, MA 02171-1734 <a href="mailto:rcurrier@granitenet.com">rcurrier@granitenet.com</a></p>	<p>Flatel, Inc. c/o Adriana Solar Executive Center, Suite 100 2300 Palm Beach Lakes Blvd. West Palm Beach, FL 33409-3307 <a href="mailto:asolar@flatel.net">asolar@flatel.net</a></p>
<p>Lightyear Network Solutions, LLC John Greive, Vice President 1901 Eastpoint Parkway Louisville, KY 40223-4145 <a href="mailto:john.greive@lightyear.net">john.greive@lightyear.net</a></p>	<p>Paula W. Foley One Communication--Earthlink 5 Wall Street Burlington, MA 01803 <a href="mailto:pfoley@corp.earthlink.com">pfoley@corp.earthlink.com</a></p>
<p>Klein Law Group Andrew M. Klein/Allen C. Zoracki 1250 Connecticut Ave. NW, Suite 200 Washington, DC 20036 <a href="mailto:AKlein@kleinlawPLLC.com">AKlein@kleinlawPLLC.com</a> <a href="mailto:azoracki@kleinlawpllc.com">azoracki@kleinlawpllc.com</a></p>	<p>PaeTec Communications, Inc. John B. Messenger, Vice President and One PaeTec Plaza 600 Willowbrook Office Park Fairport, NY 14450-4233 <a href="mailto:john.messenger@paetec.com">john.messenger@paetec.com</a></p>

<p>Access Point, Inc.  Richard Brown  1100 Crescent Green, Suite 109  Cary, NC 27518-8105  Richard.Brown@AccessPointInc.com</p>	<p>Budget Prepay, Inc.  Alan G. Gold  1501 Sunset Drive 2<sup>nd</sup> Floor  Coral Gables, FL 33143  agold@acgoldlaw.com</p>
<p>Verizon Access Transmission Services  Rebecca A. Edmonston  106 East College Avenue, Suite 710  Tallahassee, FL 32301-7721  rebecca.edmonston@verizon.com</p>	<p>Gunster, Yoakley &amp; Stewart, P.A.  Matthew J. Feil  215 South Monroe Street, Suite 601  Tallahassee, FL 32301  mfeil@gunster.com</p>
<p>Verizon Florida LLC  Dulaney L. O'Roark III  Six Concourse Parkway, NE, Suite 800  Atlanta, GA 30328  de.oroark@verizon.com</p>	<p>TW Telecom of Florida L.P.  Carolyn Ridley  2078 Quail Run Drive  Bowling Green, KY 42104  Carolyn.Ridley@twtelecom.com</p>
<p>XO Communications, LLC  Ms. Kristin U. Shulman  810 Jorie Blvd., Suite 200  Oak Brook, IL 60523  kris.shulman@xo.com</p>	<p>Windstream NuVox, Inc.  Ed Krachmer  4001 Rodney Parham Road  MS: 1170-BIFO3-53A  Little Rock, AR 7221 2  Edward.Krachmer@windstream.com</p>
<p>XO Communications Services, Inc.  Jane Whang  Davis Wright Tremaine, LLP  505 Montgomery Street, Suite 800  San Francisco, CA 94111  janewhang@dwt.com</p>	<p>Ms. Bettye Willis  Windstream  13560 Morris Rd., Suite 2500  Milton, GA 30004  bettye.j.willis@windstream.com</p>
	<p>Navigator Telecommunications, LLC  Michael McAlister  8525 Riverwood Park Drive  North Little Rock, AR 72113  mike@navtel.com</p>

/s/ Susan S. Masterton  
Susan S. Masterton