

Eric Fryson

From: Lacey, Kimberly A. [kimberly.lacey@bingham.com]
Sent: Thursday, March 22, 2012 9:01 PM
To: Filings@psc.state.fl.us
Cc: Macres, Philip J.
Subject: Docket No. 090538-TP - Notice of Serving Objections and Supplemental Responses to Qwest Communications Company, LLC First Set of Document Requests (Nos. 2(a) and 8)

Attachments: API Notice of Service.pdf

Good Evening:

Attached for filing in Docket No. 090538-TP is Access Point, Inc.'s Notice of Serving Objections and Supplemental Responses to Qwest Communications Company, LLC First Set of Document Requests (Nos. 2(a) and 8).

Regards,
Kim Lacey

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DOCUMENT NUMBER-DATE
01726 MAR 23 02
FPSC-COMMISSION CLERK

3/23/2012

Philip J. Macres
Phone: 202.373.6000
Fax: 202.373.6001
philip.macres@bingham.com

March 22, 2011

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 is Access Point, Inc.'s Notice of Serving Objections and Supplemental Responses to Qwest Communications Company, LLC's First Set of Document Requests (Nos. 2(a) and 8), submitted by electronic mail in the above-referenced docket.

Sincerely yours,

/s/ Philip J. Macres
Philip J. Macres

Enclosures

Boston
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Walnut Creek
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DOCUMENT NUMBER DATE
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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF FLORIDA

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.

Docket No. 090538-TP

Filed: March 22, 2012

**ACCESS POINT, INC.'S NOTICE OF SERVING OBJECTIONS AND
SUPPLEMENTAL RESPONSES TO QWEST COMMUNICATIONS COMPANY, LLC'S
FIRST SET OF DOCUMENT REQUESTS (NOs. 2(a) and 8)**

Access Point, Inc. ("Access Point"), by and through its undersigned counsel, hereby gives notice that it has served its Objections and Supplemental Responses to Qwest Communications Company, LLC's First Set of Document Requests (Nos. 2(a) and 8) upon the persons and in the manner indicated in the certificate of service below.

This notice is respectfully submitted by electronic mail the 22nd day of March, 2012.

/s/ Philip J. Macres

Eric J. Branfman, Esq. (not admitted in Florida) (*)

Philip J. Macres, Esq., Fla. Bar No. 137900

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(*) Pursuant to Order No. PSC-10-0691-FOF-OT in Docket No. 100008-OT issued on November 18, 2010, Eric J. Branfman has been designated as a qualified representative for the above-referenced parties in this proceeding.

Counsel for Access Point, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by email, and/or U.S. Mail this 22nd day of March, 2012.

Lee Eng Tan Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 ltan@psc.state.fl.us	Matthew J. Feil Gunster, Yoakley & Stewart, P.A. 215 S. Monroe Street, Suite 601 Tallahassee, Florida 32301 mfeil@gunster.com
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<p>Mr. John Ivanuska XO Communications Services, Inc. 10940 Parallel Parkway, Suite K - #353 Kansas City, KS 66109-4515 john.ivanuska@xo.com Kris.Shulman@xo.com</p>	<p>Richard Brown Access Point, Inc. 1100 Crescent Green, Suite 109 Cary, NC 27511 Richard.brown@accesspointinc.com</p>
<p>Adam L. Sherr Qwest Communications Company, LLC 1600 7th Avenue, Room 1506 Seattle, WA 98191 Adam.Sherr@qwest.com</p>	<p>Marsha Rule Rutledge Law Firm Post Office Box 551 Tallahassee, FL 32302 marsha@reuphlaw.com</p>
<p>Susan S. Masterton CenturyLink 315 S. Calhoun Street, Suite 500 Tallahassee, FL 32301 Susan.masterton@centurylink.com</p>	<p>Ms. Carolyn Ridley tw telecom of florida l.p. 2078 Quail Run Drive Bowling Green, KY 42104 Carolyn.Ridley@twtelecom.com</p>
<p>Alan C. Gold, P.A. 1501 Sunset Drive, 2nd Floor Coral Gables, FL 33143 acgold@acgoldlaw.com</p>	<p>Ms. Rebecca A. Edmonston Verizon Access Transmission Services 106 East College Avenue, Suite 710 Tallahassee, FL 32301-7721 Rebecca.edmonston@verizon</p>
<p>Brenda Merritt Division of Regulatory Analysis Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 bmerritt@psc.state.fl.us</p>	<p>Ed Krachmer PAETEC Communications, Inc.; US LEC of Florida, LLC d/b/a PAETEC Business Services and Windstream NuVox, Inc. 4001 Rodney Parham Road MS: 1170-B1F03-53A Little Rock, AR 72212 Edward.Krachmer@windstream.com</p>

Dulaney L. O'Roark III Verizon Florida LLC Six Concourse Parkway, NE, Suite 800 Atlanta, GA 30328 de.oroark@verizon.com	Ms. Bettye Willis PAETEC Communications, Inc.; US LEC of Florida, LLC d/b/a PAETEC Business Services and Windstream NuVox, Inc. 13560 Morris Rd., Suite 2500 Milton, GA 3004 Bettye.j.willis@windstream.com
	Howard Adams Pennington Law Firm P.O. Box 10095 Tallahassee, FL 32302 gene@penningtonlaw.com

By: /s/ Kimberly A. Lacey
 Kimberly A. Lacey