

Eric Fryson

090538-TP

**From:** Galloway, Cecilia (Cissy) [CGalloway@gunster.com]  
**Sent:** Wednesday, May 09, 2012 3:52 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Lee Eng Tan; 'aklein@kleinlawpllc.com'; 'de.oroark@verizon.com'; 'janewhang@dwt.com'; 'Chris.bunce@birch.com'; 'Edward.Krachmer@windstream.com'; 'Eric.branfman@bingham.com'; 'rcurrier@granitenet.com'; Feil, Matthew; 'Carolyn.Ridley@twtelecom.com'; 'kris.shulman@xo.com'; 'marsha@reuphlaw.com'; 'Richard.brown@accesspointinc.com'; 'John.greive@lightyear.net'; 'mike@navtel.com'; 'John.messenger@paetec.com'; 'Philip.macres@bingham.com'; 'Greg.diamond@level3.com'; 'dbailey@bullseyetelecom.com'; 'azoracki@kleinlawpllc.com'; 'bettye.j.willis@windstream.com'; 'agold@acgoldlaw.com'; 'Susan.Masterton@CenturyLink.com'; 'Sherr, Adam'; 'pfoley@corp.earthlink.com'; 'rebecca.edmonston@verizon.com'; 'gene@penningtonlaw.com'; 'lhaag@ernestgroup.com'; 'asolar@flatel.net'; 'davidd@budgetprepay.com'; Jessica Miller  
**Subject:** RE: PSC Filing Dkt 090538-TP - Windstream Nuvox Inc. Notice of Serving 1st Set of Discovery to Qwest

**Attachments:** WindstreamNuvox NOTICE 1st Set of Disc to Qwest.pdf

The attached is an electronic filing for the docket referenced below. If you have any questions, please contact Matt Feil at the number below. Thank you.

**Person Responsible for Filing:**

Matthew Feil  
 Gunster Law Firm  
 215 South Monroe Street, Suite 601  
 Tallahassee, FL 32301  
 Direct: 850-521-1708  
 Main: 850-521-1980  
[mfeil@gunster.com](mailto:mfeil@gunster.com)

**Docket Name and Number:** Docket No. 090538-TP – 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.

**Filed on Behalf of:** Windstream Nuvox, Inc.

**Total Number of Pages:** 5

**Description of Documents:** Windstream Nuvox, Inc.'s Notice of Serving 1<sup>st</sup> Set of Interrogatories (Nos. 1-12), Requests for Admission (Nos. 1-2), and Document Requests (Nos. 1-14) to Qwest Communications Co., LLC

DATE FILED NUMBER DATE

02974 MAY -9 09

5/9/2012

FPSC-COMMISSION CLERK



**GUNSTER**

FLORIDA'S LAW FIRM FOR BUSINESS

Cecilia C. Galloway  
Governmental Affairs  
215 S. Monroe Street, Suite 601  
Tallahassee, FL 32301  
Main 850-521-1980 Direct 850-521-1726

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**Tax Advice Disclosure:** To ensure compliance with requirements imposed by the IRS under Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments), unless otherwise specifically stated, was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any matters addressed herein. *Click the following hyperlink to view the complete Gunster IRS Disclosure & Confidentiality note.*

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

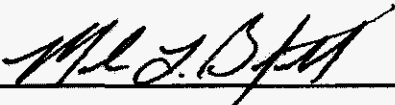
Amended Complaint of Qwest Communications }  
Company, LLC against MCImetro Access Transmission } Docket No. 090538-TP  
Services (d/b/a Verizon Access Transmission }  
Services); XO Communications Services, Inc.; }  
tw telecom of florida, l.p.; Granite Telecommunications, } Filed: May 9, 2012  
LLC; 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. }  
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**WINDSTREAM NUVOX INC.'S NOTICE OF SERVING FIRST SET OF INTERROGATORIES (NOS. 1-12), FIRST SET OF REQUESTS FOR ADMISSION (NOS. 1-2), AND FIRST SET OF DOCUMENT REQUESTS (NOS. 1-14) TO QWEST COMMUNICATIONS COMPANY, LLC**

Windstream NuVox, Inc. ("Windstream NuVox", or "the Company"), by and through its undersigned counsel, hereby gives notice that the Company has served its First Set of Interrogatories (Nos. 1-12), First Set of Requests for Admission (Nos. 1-2), and First Set of Document Requests (Nos. 1-14) to Qwest Communications Company, LLC by electronic mail and/or U.S. Mail to Ms. Susan Masterton of CenturyLink, QCC and Mr. Adam Sherr of Qwest Communications, Company, LLC. Copies of same have been provided to parties consistent with the attached Certificate of Service.

DOCUMENT ACCEPTED DATE  
02974 MAY-9 2012  
FPSC-COMMISSION CLERK

This notice is respectfully submitted by electronic mail the 9<sup>th</sup> day of May, 2012.

  
f **Matthew J. Feil**  
Gunster, Yoakley & Stewart, P.A.  
215 S. Monroe Street, Suite 601  
Tallahassee, Florida 32301  
Telephone: (850) 521-1980  
Facsimile: (850) 576-0902

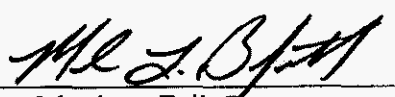
**CERTIFICATE OF SERVICE**

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 9th day of May, 2012.

Lee Eng Tan Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <a href="mailto:ltan@psc.state.fl.us">ltan@psc.state.fl.us</a>	Eric J. Branfman/Philip J. Macres Bingham Law Firm 2020 K Street, NW Washington, DC 20006 <a href="mailto:eric.branfman@bingham.com">eric.branfman@bingham.com</a> <a href="mailto:Philip.macres@bingham.com">Philip.macres@bingham.com</a>
Mr. Chris Bunce Birch Communications, Inc. 2300 Main Street, Suite 600 Kansas City, MO 64108-2415 <a href="mailto:Chris.bunce@birch.com">Chris.bunce@birch.com</a>	Mr. Greg Diamond Broadwing Communications, Inc. c/o Level 3 Communications 1025 Eldorado Boulevard Broomfield, CO 80021-8869 <a href="mailto:Greg.Diamond@level3.com">Greg.Diamond@level3.com</a>
Richard Brown Access Point, Inc. 1100 Crescent Green, Suite 109 Cary, NC 27511 <a href="mailto:Richard.brown@accesspointinc.com">Richard.brown@accesspointinc.com</a>	Mr. David Bailey BullsEye Telecom, Inc. 25925 Telegraph Road, Suite 210 Southfield, MI 48033-2527 <a href="mailto:dbailey@bullseyetelecom.com">dbailey@bullseyetelecom.com</a>
Adam C. Gold, P.A. 1501 Sunset Drive, 2 <sup>nd</sup> Floor Coral Gables, FL 33143 <a href="mailto:agold@acgoldlaw.com">agold@acgoldlaw.com</a>	Paula W. Foley Earthlink Business 5 Wall Street Burlington, MA 01803 <a href="mailto:pfoley@corp.earthlink.com">pfoley@corp.earthlink.com</a>
Ernest Communications, Inc. 5275 Triangle Parkway, Suite 150 Norcross, GA 30092-6511 <a href="mailto:lhaag@ernestgroup.com">lhaag@ernestgroup.com</a>	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>
Granite Telecommunications, LLC 100 Newport Avenue Extension Quincy, MA 02171-1734 <a href="mailto:rcurrier@granitenet.com">rcurrier@granitenet.com</a>	Andrew M. Klein/Allen C. Zoracki Klein Law Group 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>John Greive  Lightyear Network Solutions, LLC  1901 Eastpoint Parkway  Louisville, KY 40223-4145  <a href="mailto:john.greive@lightyear.net">john.greive@lightyear.net</a></p>	<p>Michael McAlister  Navigator Telecommunications, LLC  P.O. Box 13860  North Little Rock, AR 72113-0860  <a href="mailto:mike@navtel.com">mike@navtel.com</a></p>
<p>Adam L. Sherr  Qwest Communications Company, LLC  1600 7th Avenue, Room 1506  Seattle, WA 98191  <a href="mailto:Adam.Sherr@centurylink.com">Adam.Sherr@centurylink.com</a></p>	<p>Susan S. Masterton, Esq.  CenturyLink QCC  315 S. Calhoun Street, Suite 500  Tallahassee, FL 32301  <a href="mailto:susan.masterton@centurylink.com">susan.masterton@centurylink.com</a></p>
<p>Budget PrePay, Inc.  Lakisha Taylor  1325 Barksdale Blvd., Suite 200  Bossier City, LA 71111-4600  <a href="mailto:davidd@budgetprepay.com">davidd@budgetprepay.com</a></p>	<p>Marsha Rule  Rutledge Law Firm  Post Office Box 551  Tallahassee, FL 32302  <a href="mailto:marsha@reuphlaw.com">marsha@reuphlaw.com</a></p>
<p>Ms. Kristin U. Shulman  XO Communications  810 Jorie Blvd., Suite 200  Oak Brook, IL 60523  <a href="mailto:kris.shulman@xo.com">kris.shulman@xo.com</a></p>	<p>Laura King  Division of Regulatory Analysis  Florida Public Service Commission  2540 Shumard Oak Boulevard  Tallahassee, FL 32399  <a href="mailto:lking@psc.state.fl.us">lking@psc.state.fl.us</a></p>
<p>Dulaney L. O'Roark III  Verizon Florida, LLC  5055 North Point Parkway  Alpharetta, GA 30022  678-259-1657 (phone)  678-259-5326 (fax)  <a href="mailto:de.oroark@verizon.com">de.oroark@verizon.com</a></p>	<p>Ms. Carolyn Ridley  tw telecom of florida l.p.  2078 Quail Run Drive  Bowling Green, KY 42104  <a href="mailto:Carolyn.Ridley@twtelecom.com">Carolyn.Ridley@twtelecom.com</a></p>
<p>Pennington Law Firm  Howard Adams  P.O. Box 10095  Tallahassee, FL 32302  <a href="mailto:gene@penningtonlaw.com">gene@penningtonlaw.com</a></p>	<p>Ms. Rebecca A. Edmonston  Verizon Access Transmission Services  106 East College Avenue, Suite 710  Tallahassee, FL 32301-7721  <a href="mailto:rebecca.edmonston@verizon.com">rebecca.edmonston@verizon.com</a></p>

Ed Krachmer Windstream NuVox, Inc. 4001 Rodney Parham Road MS: 1170-B1F03-53A Little Rock, AR 72212 <a href="mailto:Edward.Krachmer@windstream.com">Edward.Krachmer@windstream.com</a>	James White Windstream NuVox, Inc. 4651 Salisbury Road, Suite 151 Jacksonville, FL 32256-6187 <a href="mailto:Bettye.j.willis@windstream.com">Bettye.j.willis@windstream.com</a>
Jane J. Whang Davis Wright Tremaine, LLP 505 Montgomery Street, Suite 800 San Francisco, CA 94111-6533 <a href="mailto:janewhang@dwt.com">janewhang@dwt.com</a>	Ms. Bettye Willis 13560 Morris Rd., Suite 2500 Milton, GA 30004 <a href="mailto:Bettye.j.willis@windstream.com">Bettye.j.willis@windstream.com</a>

By:   
Matthew Feil, Esq.