

Eric Fryson

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Sent: Monday, July 16, 2012 12:55 PM
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Subject: RE: PSC Filing Dkt 090538-TP - Saturn Telecommunications Services, Inc. Letter
Attachments: Saturn testimony LTR to PSC 7-16-12.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:

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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: Saturn Telecommunications Services, Inc. d/b/a Earthlink Business (Saturn)

Total Number of Pages: 4

Description of Documents: Letter to PSC from Saturn regarding testimony of Mr. Don Wood

DOCUMENT NUMBER-DATE

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GUNSTER

FLORIDA'S LAW FIRM FOR BUSINESS

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July 16, 2012

BY ELECTRONIC FILING

Ms. Ann Cole, Director
Office of the 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 (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:

By Order No. PSC-12-0305-PCO-TP, issued June 14, 2012, in the captioned docket, the Commission granted Qwest Communications Company LLC's 'Motion for Leave to file a Second Amended Complaint,' whereby Saturn Telecommunications Services, Inc. d/b/a Earthlink Business (Saturn) would be added as a respondent in this proceeding. By Order No. PSC-12-0330-PCO-TP, issued June 26, 2012, the Commission required both Qwest and Saturn to file direct testimony on July 16, 2012.

Saturn has reviewed information available to it regarding this matter and has considered Qwest's claims and Saturn's defenses to same. At this time, Saturn has decided to adopt the direct testimony of Mr. Don Wood as filed on June 14, 2012, by substituting throughout that testimony the names "Saturn Telecommunications Services, Inc." or "Saturn" for the names "STS Telecom LLC" or "STS." Saturn submits that by a copy of this letter, Qwest, staff and all parties have notice of this approach for Saturn's direct testimony. To conserve resources and

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minimize confusion, Saturn intends to have Mr. Wood make this substitution when he testifies at hearing rather than sending replacement pages for every filed and distributed copy of Mr. Wood's direct testimony.

Because the Commission permitted Qwest to file direct against Saturn four weeks after Qwest filed direct against all of the other CLEC respondents in this case, it is possible that Saturn may require additional time to file rebuttal, currently scheduled to be filed on August 9 for all parties. If, after reviewing Qwest's direct testimony, Saturn believes additional time for rebuttal is required, Saturn will take the appropriate steps to request such.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Matthew J. Feil".

Matthew J. Feil

MJF

C: Parties per Certificate of Service

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 16th day of July, 2012.

Lee Eng Tan Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 ltan@psc.state.fl.us	Ms. Bettye Willis 13560 Morris Rd., Suite 2500 Milton, GA 30004 Bettye.j.willis@windstream.com
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<p>Budget PrePay, Inc. Lakisha Taylor 1325 Barksdale Blvd., Suite 200 Bossier City, LA 71111-4600 <u>davidd@budgetprepay.com</u></p>	<p>Ms. Carolyn Ridley tw telecom of florida l.p. 2078 Quail Run Drive Bowling Green, KY 42104 <u>Carolyn.Ridley@twtelecom.com</u></p>
<p>Jessica Miller Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 <u>JEMiller@psc.state.fl.us</u> <u>BSalak@psc.state.fl.us</u></p>	<p>Ms. Rebecca A. Edmonston Verizon Access Transmission Services 106 East College Avenue, Suite 710 Tallahassee, FL 32301-7721 <u>rebecca.edmonston@verizon.com</u></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) <u>de.oroark@verizon.com</u> <u>richard.b.severy@verizon.com</u></p>	<p>Ed Krachmer Windstream NuVox, Inc. 4001 Rodney Parham Road MS: 1170-B1F03-53A Little Rock, AR 72212 <u>Edward.Krachmer@windstream.com</u></p>

By: 
Matthew Feil, Esq.