## Eric Fryson

From:

Allen Zoracki [azoracki@kleinlawpllc.com]

Sent:

Friday, September 28, 2012 3:56 PM

To:

Filings@psc.state.fl.us

Cc:

Lee Eng Tan; Jessica Miller; 'Sherr, Adam'; Susan.Masterton@CenturyLink.com; 'Feil, Matthew'; 'Marsha Rule'; de.oroark@verizon.com; agold@acgoldlaw.com; 'Andrew Klein'; asolar@flatel.net; flatel@aol.com; mike@navtel.com; lhaag@ernestgroup.com; rebecca.edmonston@verizon.com;

'Foley, Paula'; davidd@budgetprepay.com; 'Ridley, Carolyn'; gene@penningtonlaw.com; bettye.j.willis@windstream.com; Edward.Krachmer@windstream.com; 'Michael Shortley'

Subject:

Docket No. 090538-TP - BullsEye Notice of Objections and Responses to QCC Discovery

Attachments: 090538-TP - NOTICE of Srvg Resp to QCC 2d Discovery - BullsEye.pdf

Attached for electronic filing in the above-referenced docket, please find BullsEye Telecom, Inc.'s Notice of Serving Objections and Responses to Qwest Communications Company, LLC's Second Set of Interrogatories (Nos. 9-19) and Document Requests (Nos. 6-11). If you have any questions, please do not hesitate to contact us.

a. Persons responsible for filing:

Andrew M. Klein Allen C. Zoracki

KLEIN LAW GROUP PLLC 1250 Connecticut Ave. NW

Suite 200

Washington, DC 20036 Phone: (202) 289-6955

AKlein@KleinLawPLLC.com AZoracki@KleinLawPLLC.com

- b. Docket No.: 090538-TP Amended Complaint of Qwest Communications Company, LLC against MCImetro Access, et al.
- c. Filed on behalf of: BullsEye Telecom, Inc.
- d. Total pages: 4
- e. Brief Description: BullsEye Notice of Serving Objections and Responses to QCC Discovery

Respectfully submitted,

Allen C. Zoracki

KLEIN LAW GROUP PLLC Direct: (518) 336-4300 General: (202) 289-6955

\*Admitted in New York

DOCUMENT NUMBER-DATE

06535 SEP 28 º

FPSC-COMMISSION CLERK

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Amended Complaint of OWEST COMMUNICATIONS COMPANY, LLC, Against MCIMETRO ACCESS TRANSMISSION SERVICES, LLC (D/B/A VERIZON ACCESS TRANSMISSION SERVICES), TW TELECOM OF FLORIDA, L.P., GRANITE TELECOMMUNICATIONS, LLC, BROADWING COMMUNICATIONS, LLC, BUDGET PREPAY, INC., BULLSEYE TELECOM, INC., DELTACOM, INC., ERNEST COMMUNICATIONS, INC., FLATEL, INC., NAVIGATOR TELECOMMUNICATIONS, LLC, PAETEC COMMUNICATIONS, INC., SATURN TELECOMMUNICATIONS SERVICES, INC. (D/B/A EARTHLINK BUSINESS), US LEC OF FLORIDA, LLC, WINDSTREAM NUVOX, INC., AND JOHN DOES 1 THROUGH 50.

Docket No. 090538-TP

Dated: September 28, 2012

## BULLSEYE TELECOM, INC.'S NOTICE OF SERVING OBJECTIONS AND RESPONSES TO QUEST COMMUNICATIONS COMPANY, LLC'S SECOND SET OF INTERROGATORIES (NOS. 9–19) AND DOCUMENT REQUESTS (NOS. 6-11)

BULLSEYE TELECOM, INC. ("BullsEye"), by and through its undersigned counsel, hereby gives notice that it has served its objections and responses to Qwest Communications Company, LLC's Second Set of Interrogatories (Nos. 9-19) and Document Requests (Nos 6-11) upon the parties and in the manner indicated on the attached certificate of service.

This notice is respectfully submitted by electronic mail the 28th day of September, 2012.

/s Andrew M. Klein

Andrew M. Klein\*
Allen C. Zoracki\*
KLEIN LAW GROUP PLLC
1250 Connecticut Ave. NW, Suite 200

Washington, DC 20036 Phone: (202) 289-6955

Email: AKlein@KleinLawpllc.com Email: AZoracki@KleinLawpllc.com

Counsel for Respondent BullsEye Telecom, Inc.

\* Designated as a qualified representative in Docket No. 100008-OT

DOCUMENT NUMBER-DATE

06535 SEP 28 º

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic delivery and/or U.S. Mail this 28th day of September, 2012, to the following:

Florida Public Service Commission Theresa Tan Jessica Miller Florida Public Service Commission Office of General Counsel 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 ltan@psc.state.fl.us jemiller@psc.state.fl.us

d/b/a CenturyLink QCC Adam L. Sherr Associate General Counsel Owest 1600 7th Avenue, Room 1506 Seattle, WA 98191 Tel: 206-398-2507

Fax: 206-343-4040

Email: Adam.Sherr@qwest.com

tw telecom of florida, l.p. XO Communications Services, Inc. Windstream NuVox, Inc. DeltaCom. Inc. Saturn Telecommunications Services, Inc. PAETEC Communications, Inc. US LEC of Florida, LLC d/b/a PAETEC **Business Services** Matthew J. Feil Gunster Yoakley & Stewart, P.A. 215 S. Monroe Street, Suite 618 Tallahassee, FL 32301 mfeil@gunster.com

Qwest Communications Company, LLC Qwest Communications Company, LLC d/b/a CenturyLink QCC Susan S. Masterton CenturyLink 315 S. Calhoun St., Suite 500 Tallahassee, FL 32301 Tel: 850-599-1560 Fax: 850-224-0794 susan.masterton@centurylink.com

> Broadwing Communications, LLC Marsha E. Rule Rutledge, Ecenia & Purnell P.O. Box 551 Tallahassee, FL 32302-0551 marsha@reuphlaw.com

MCImetro Access Transmission Service d/b/a VerizonAccess Transmission Services Dulaney O'Roark VerizonAccess Transmission Services Six Concourse Pkwy, NE, Ste 800 Atlanta, GA 30328 De.oroark@verizon.com Budget Prepay, Inc.
Alan C. Gold
Alan C. Gold, P.A.
1501 Sunset Drive, 2<sup>nd</sup> Floor
Coral Gables, FL 33143
agold@acgoldlaw.com

Granite Telecommunications, LLC
Andrew M. Klein
Allen C. Zoracki
Klein Law Group, PLLC
1250 Connecticut Avenue, NW
Suite 200
Washington, D.C. 20036
aklein@kleinlawpllc.com
azoracki@kleinlawpllc.com

Flatel, Inc. c/o Adriana Solar 2300 Palm Beach Lakes Blvd. Executive Center, Suite 100 West Palm Beach, Florida 33409 asolar@flatel.net flatel@aol.com

Navigator Telecommunications, LLC Michael McAlister, General Counsel Navigator Telecommunications, LLC 8525 Riverwood Park Drive P. O. Box 13860 North Little Rock, AR 72113 mike@navtel.com Ernest Communications, Inc. General Counsel 5275 Triangle Parkway Suite 150 Norcross, GA 30092 lhaag@ernestgroup.com

Verizon Access Transmission Services Rebecca A. Edmonston 106 East College Avenue, Suite 710 Tallahassee, FL 32301-7721 rebecca.edmonston@verizon.com Broadwing Communications, Inc.
Michael J. Shortely, III
Vice President – Legal
Level 3 Communications
225 Kenneth Drive
Rochester, NY 14623
michael .shortley@level3.com

Earthlink Business
Paula W. Foley
5 Wall Street
Burlington, MA 01803
pfoley@corp.earthlink.com

Budget Prepay, Inc. Lakisha Taylor 1325 Barksdale Blvd., Suite 200 Bossier City, LA 71111-4600 davidd@budgetprepay.com

tw telecom of florida l.p.
Carolyn Ridley
2078 Quail Run Drive
Bowling Green, KY 42104
carolyn.ridley@twtelecom.com

Pennington Law Firm
Howard Adams
P.O. Box 10095
Tallahassee, FL 32302
gene@penningtonlaw.com

Windstream NuVox, Inc.
Bettye Willis
13560 Morris Rd., Suite 2500
Milton, GA 30004
bettye.j.willis@windstream.com

Windstream NuVox, Inc.
Ed Krachmer
4001 Rodney Parham Rd.
MS: 1170-B1F03-53A
Little Rock, AR 72212
edward.krachmer@windstream.com

/s Allen C. Zoracki

Allen C. Zoracki