

MOYLE, FLANIGAN, KATZ, KOLINS, RAYMOND & SHEEHAN, P.A.

ATTORNEYS AT LAW

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FLORIDA PUBLIC
SERVICE COMMISSION

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ORIGINAL

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January 28, 2000

BY U.S. MAIL

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
4750 Esplanade Way, Room 110
Tallahassee, FL 32399

Re: Complaint of Global NAPs, Inc., Against BellSouth Telecommunications, Inc. for Enforcement of Section VI(B) of its Interconnection Agreement with BellSouth Telecommunications, Inc., and Request for Relief Docket No. 991267-TP

Dear Ms. Bayo:

Enclosed is the original and one copy of Global Naps' Notice of Filing and Service of Response to Staff's First Request for Production of Documents to be filed in the above-styled matter.

Sincerely,



Jon C. Moyle, Jr.

AFA _____
APP _____
CAF _____
CMU _____
CTR _____ JCM/jd
EAG _____
LEG _____
MAS _____ Enclosures
OPC _____
RRR _____
SEC _____
V _____

DOCUMENT NUMBER-DATE

01342 FEB-18

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Global NAPs, Inc., Against)	
BellSouth Telecommunications, Inc., for)	
Enforcement of Section VI(B) of its Interconnection)	Docket No. 991267-TP
Agreement with BellSouth Telecommunications, Inc.,)	Filed January 28, 2000
and Request for Relief.)	
_____)	

**GLOBAL NAPs, INC.'S NOTICE OF FILING
AND SERVICE OF RESPONSE TO STAFF'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

GLOBAL NAPs, INC., by and through its undersigned attorneys, hereby gives notice that on this 28th day of January, 2000, it filed its Response to Staff's First Request for Production of Documents and served copies of same as indicated on the attached certificate of service.

Respectfully submitted this 28th day of January, 2000.

Jon C. Moyle, Jr.
Fla. Bar No. 727016
Cathy M. Sellers
Fla. Bar No. 0784958
Moyle Flanigan Katz Kolins
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118 North Gadsden Street
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(850) 681-3828

William J. Rooney, General Counsel
John O. Postl, Assistant General Counsel
GloBTI NAPs, Inc.
10 Merrymount Road
Quincy, MA 02169
(617) 507-5111

DOCUMENT NUMBER-DATE

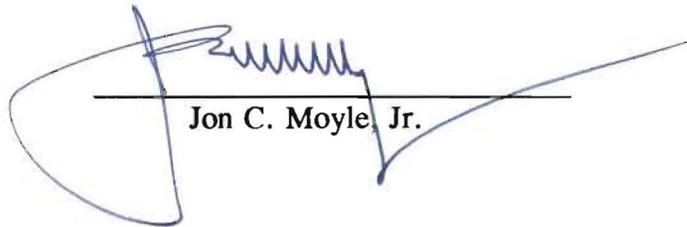
01342 FEB-18

FPSC-RECORDS/REPORTING

Christopher W. Savage
Coles, Raywid, & Braverman, L.L.P.
1919 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 828-9811

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished this 28th day of January, 2000 by U.S. Mail to Michael P. Goggin, BellSouth Telecommunications, Inc., Museum Tower, Suite 1910, 150 West Flagler Street, Miami, FL 33130, R. Douglas Lackey and E. Earl Edenfield, Jr., BellSouth Telecommunications, Inc., BellSouth Center, Suite 4300, 675 W. Peachtree Street, N.E., Atlanta, GA 30375, Beth Keating, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399 and Nanette Edwards, Regulatory Attorney, ITC DeltaCom, 700 Boulevard South, Suite 101, Huntsville, AL 35802



Jon C. Moyle, Jr.