

ORIGINAL



Kimberly Caswell
Vice President and General Counsel, Southeast
Legal Department

FLTC0007
201 North Franklin Street (33602)
Post Office Box 110
Tampa, Florida 33601-0110

Phone 813 483-2606
Fax 813 204-8870
kimberly.caswell@verizon.com

February 8, 2002

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 990649B-TP
Investigation into Pricing of Unbundled Network Elements (Sprint/Verizon track)

Dear Ms. Bayo:

Please find enclosed for filing in the above matter an original and one copy of Verizon Florida Inc.'s Notices of Service of First Set of Interrogatories (Nos. 1-24) and First Request for Production of Documents (Nos. 1-13) to AT&T Communications of the Southern States, Inc., MCI metro Access Transmission Services, LLC, MCI WorldCom, Inc. and Florida Digital Network, Inc. (collectively, the "ALEC Coalition"). Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

KC:tas
Enclosures

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC _____
- OTH _____

RECEIVED

FPSC BUREAU OF RECORDS

02 FEB 11 AM 9:22

DISTRIBUTION CENTER

DOCUMENT NUMBER-DATE

01578 FEB 11 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled)
network elements (Sprint/Verizon track))
_____)

Docket No. 990649B-TP
Filed: February 8, 2002

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST SET OF INTERROGATORIES (NOS. 1-24) TO
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC., MCIMETRO
ACCESS TRANSMISSION SERVICES, LLC, MCI WORLDCOM, INC., AND
FLORIDA DIGITAL NETWORK, INC.**

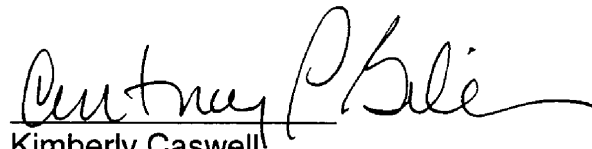
NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Set of Interrogatories (Nos. 1-24) on AT&T Communications of the Southern States, Inc., MCI metro Access Transmission Services, LLC, MCI WorldCom, Inc. and Florida Digital Network, Inc. (collectively, the "ALEC Coalition") by U.S. mail and electronic mail on February 8, 2002 to thatch@lawfla.com, donna.mcnulty@wcom.com, and m.feil@floridadigital.net.

The original and one copy of this Notice were sent via overnight delivery on February 8, 2002 to the Director, Division of the Commission Clerk and Administrative Services, at the Commission. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on February 8, 2002.

By:

for



Kimberly Caswell
Post Office Box 110, FLTC0007
Tampa, Florida 33601
Telephone: 813-483-2617

Attorney for Verizon Florida Inc.

DOCUMENT NUMBER DATE

01578 FEB 11 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

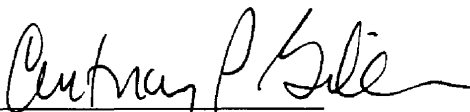
In re: Investigation into pricing of unbundled)
network elements (Sprint/Verizon track))
_____)
Docket No. 990649B-TP
Filed: February 8, 2002

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-13) TO
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC., MCIMETRO
ACCESS TRANSMISSION SERVICES, LLC, MCI WORLD COM, INC., AND
FLORIDA DIGITAL NETWORK, INC.**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Production of Documents (Nos. 1-13) on AT&T Communications of the Southern States, Inc., MCI metro Access Transmission Services, LLC, MCI WorldCom, Inc. and Florida Digital Network, Inc. (collectively, the "ALEC Coalition") by U.S. mail and electronic mail on February 8, 2002 to thatch@lawfla.com, donna.mcnulty@wcom.com, and m.feil@floridadigital.net.

The original and one copy of this Notice were sent via overnight delivery on February 8, 2002 to the Director, Division of the Commission Clerk and Administrative Services, at the Commission. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

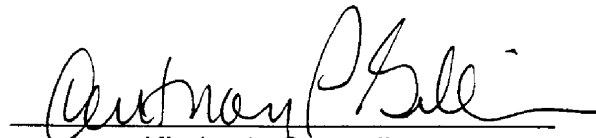
Respectfully submitted on February 8, 2002.

By: 
or Kimberly Caswell
Post Office Box 110, FLTC0007
Tampa, Florida 33601
Telephone: 813-483-2617

Attorney for Verizon Florida Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Notices of Service, First Set of Interrogatories (Nos. 1-24) and First Request for Production of Documents (Nos. 1-13) to AT&T Communications of the Southern States, Inc., MCImetro Access Transmission Services, LLC, MCI WorldCom, Inc. and Florida Digital Network, Inc. (collectively, the "ALEC Coalition") in Docket No. 990649B-TP were sent via U. S. mail on February 8, 2002 to the parties on the attached list.



gar Kimberly Caswell

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Pennington Law Firm *
Marc W. Dunbar
Karen M. Camechis
215 S. Monroe St., 2nd Floor
Tallahassee, FL 32301

AT&T *
Marsha Rule
101 N. Monroe Street
Suite 700
Tallahassee, FL 32301-1549

BellSouth Telecommunications *
Nancy B. White
c/o Nancy H. Sims
150 South Monroe St., Suite 400
Tallahassee, FL 32301-1556

Florida Cable Telecomm. Assoc. *
Michael A. Gross
246 East 6th Avenue, Suite 100
Tallahassee, FL 32303

Florida Public Tele. Assoc.
Angela Green
2292 Wednesday Street
Suite 2
Tallahassee, FL 32308

MCI WorldCom Inc. *
Donna Canzano McNulty
The Atrium Building, Suite 105
325 John Knox Road
Tallahassee, FL 32303-4131

John Spilman
Broadslate Networks Inc.
675 Peter Jefferson Parkway
Suite 310
Charlottesville, VA 22911

Brent E. McMahan
VP-Reg./Govt. Affairs
Network Telephone Corp.
815 South Palafox Street
Pensacola, FL 32501

Time Warner Telecom *
Carolyn Marek
233 Bramerton Court
Franklin, TN 37069

Joseph McGlothlin *
McWhirter Reeves Law Firm
117 S. Gadsden Street
Tallahassee, FL 32301

Stephen C. Reilly
Office of Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Bruce May
Holland Law Firm
315 S. Calhoun Street
Suite 600
Tallahassee, FL 32301

Richard D. Melson *
Gabriel E. Nieto
Hopping Law Firm
123 S. Calhoun Street
Tallahassee, FL 32314

Jim Lamoureux*
Virginia Tate*
AT&T
1200 Peachtree Street
Suite 8100
Atlanta, GA 30309

Mark Buechele
Supra Telecommunications
Koger Center-Ellis Building
1311 Executive Center Drive
Suite 200
Tallahassee, FL 32301-5027

Vicki Gordon Kaufman *
McWhirter Reeves Law Firm
117 South Gadsden Street
Tallahassee, FL 32301

Gregory J. Darnell *
MCI WorldCom Inc.
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328

Charles Rehwinkel *
Susan Masterton*
Sprint-Florida
1313 Blairstone Road
MC FLTLHO0107
Tallahassee, FL 32301

Marc B. Rothschild
Robert Ridings
Swidler & Berlin
3000 K Street NW, Suite 300
Washington, DC 20007-5116

Catherine F. Boone *
Covad Comm. Co.
10 Glenlake Parkway
Suite 650
Atlanta, GA 30328-3495

George S. Ford*
Chief Economist
Z-Tel Communications Inc.
601 S. Harbour Island Blvd.
Tampa, FL 33602

Jonathan E. Canis
Michael B. Hazzard
Kelley Drye & Warren
1200 19th St. NW, 5th Floor
Washington, DC 20036

Rodney L. Joyce
Shook Hardy & Bacon LLP
600 14th St. N.W., Suite 800
Washington, DC 20005-2004

Tracy W. Hatch/Floyd R. Self
Messer Law Firm
215 S. Monroe Street
Suite 701
Tallahassee, FL 32302

Eric Branfman/Morton Posner *
Swidler & Berlin
3000 K Street NW, Suite 300
Washington, DC 20007-5116

Florida Digital Network, Inc.
390 North Orange Avenue
Suite 2000
Orlando, FL 32801

Charles Pellegrini
Patrick Wiggins
Katz Kutter Law Firm
106 East College Avenue
12th Floor
Tallahassee, FL 32301

Network Access Solutions Corp.
13650 Dulles Technology Drive
Herndon, VA 20171-4602

John D. McLaughlin, Jr.
KMC Telecom III, Inc.
1755 North Brown Road
Lawrenceville, GA 30034