

Kimberly Caswell
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February 11, 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 Request for Production of Documents (No. 1) to Florida Public Service Commission Staff and Z-Tel Communications, Inc. and Notice of Service of Second Request for Production of Documents (No. 14) 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"). Also enclosed are an original and 15 copies of Verizon Florida Inc.'s Motion for Extension of Time to File Surrebuttal Testimony.

Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-2617.

Sincerely,

Kim Kimberly Caswell

KC:tas
Enclosures

RECEIVED & FILED
Kim Notice
DOCUMENT NUMBER - DATE
FPSC-BUREAU OF RECORDS
01644 FEB 12 2002

02 FEB 12 AM 11:01
DISTRIBUTION CENTER

Motion
DOCUMENT NUMBER DATE
01645 FEB 12 2002
FPSC-COMMISSION CLERK

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 11, 2002

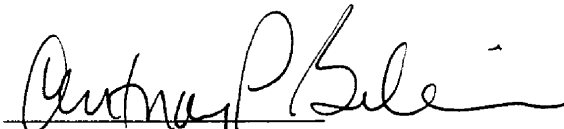
**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1) TO
Z-TEL COMMUNICATIONS, INC.**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Production of Documents on Z-Tel Communications, Inc. by U.S. mail and electronic mail on February 11, 2002 to jmcglothlin@mac-law.com.

The original and one copy of this Notice were sent via overnight delivery on February 11, 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 11, 2002.

By:


or Kimberly Caswell

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

Attorney for Verizon Florida Inc.

DOCUMENT NUMBER-DATE

01644 FEB 12 2002

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

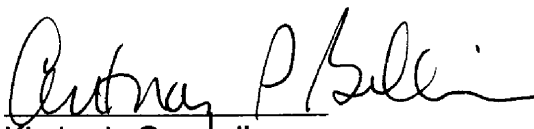
Docket No. 990649B-TP
Filed: February 11, 2002

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 14) 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 Second Request for Production of Documents (No. 14) on 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") by U.S. mail and electronic mail on February 11, 2002 to thatch@lawfla.com, donna.mcnulty@wcom.com, and mfeil@floridadigital.net.

The original and one copy of this Notice were sent via overnight delivery on February 11, 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 11, 2002.

By: 
Kimberly Caswell
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Tampa, Florida 33601
Telephone: 813-483-2617

Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled)
network elements (Sprint/Verizon track))
_____)
Docket No. 990649B-TP
Filed: February 11, 2002

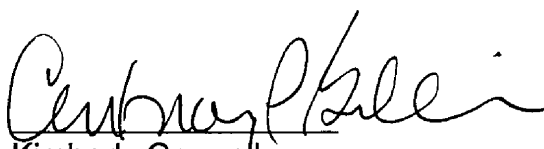
**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1) TO
FLORIDA PUBLIC SERVICE COMMISSION STAFF**

NOTICE IS HEREBY GIVEN that Verizon Florida Inc., by and through its undersigned counsel, has served its First Request for Production of Documents on the Florida Public Service Commission Staff by U.S. mail and electronic mail on February 11, 2002 to jfudge@psc.state.fl.us.

The original and one copy of this Notice were sent via overnight delivery on February 11, 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 11, 2002.

By:

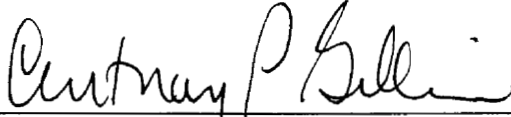

Kimberly Caswell

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 Request for Production of Documents (No. 1) to Florida Public Service Commission Staff and Z-Tel Communications, Inc., Second Request for Production of Documents (No. 14) 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"), and Motion for Extension of Time to File Surrebuttal Testimony in Docket No. 990649B-TP were sent via U. S. mail and/or electronic mail on February 11, 2002 to the parties on the attached list.



for Kimberly Caswell

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