

MCWHIRTER REEVES
ATTORNEYS AT LAW

TAMPA OFFICE:
400 NORTH TAMPA STREET, SUITE 2450
TAMPA, FLORIDA 33602
P. O. BOX 3350 TAMPA, FL 33601-3350
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:
TALLAHASSEE

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX

March 4, 2002

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket No.: 990649B-TP

Dear Ms. Bayo:

On behalf of Z-Tel Communications, Inc., I am enclosing the original and 1 copy of the Notice of Service of Z-tel Communications, Inc.'s Response to Verizon Florida Inc.'s First Request For Production of Documents (No. 1).

Please return a date stamped copy of this letter and the pleading to me. Thank you for your assistance in this matter.

Yours truly,



Joseph A. McGlothlin

JAM/mls
Enclosure

DOCUMENT NUMBER DATE
02493 MAR -4 02
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

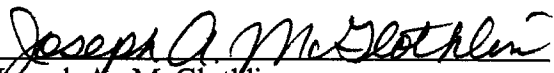
In re: Investigation into
pricing of unbundled
elements (Sprint/Verizon track)

)
) Docket No. 990649B-TP
) Filed: March 4, 2002

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

Please take notice that on this date, Z-Tel Communications, Inc. ("Z-Tel") served via Federal Express to Kimberly Caswell, Verizon Florida, Inc., Legal Department 201 North Franklin Street, Tampa, Florida 33602 and by Hand Delivery to Jason K. Fudge, Florida Public Service Commission, Gerald L. Gunter Building, 2540 Shumard Oak Blvd, Tallahassee, Florida 32399-0850 and by E-mail its Response to Verizon Florida, Inc.'s First Request for Production of Documents (No. 1). Copies of Z-Tel's Response was also on this date served via U.S. Mail and E-mail to other parties of record.

Dated this 4th day of March, 2002.



Joseph A. McGlothlin
McWhirter, Reeves, McGlothlin, Davidson, Decker,
Kaufman, Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 Phone
(850) 222-5606 Fax
jmcglothlin@mac-law.com

Attorneys for Z-Tel Communications, Inc.

DOCUMENT NUMBER - DATE

02493 MAR -4 02

FPSC-COMMISSION CLERK

JFC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Notice of Service of Z-Tel Communications, Inc.'s Response to Verizon Florida, Inc.'s First Request for Production of Documents has on this 4th day of March, 2002 been served (*) Hand Delivery, E-mail and U.S. Mail to the following:

(*)Jason K. Fudge
Florida Public Service Commission
Gerald L. Gunter Building
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850
jfudge@psc.state.fl.us

Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street
Tallahassee, FL 32301

Kimberly Caswell
Verizon Select Services, Inc.
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110
kimberly.caswell@verizon.com

Marsha Rule
AT&T Communications of the Sou. States, Inc.
101 N. Monroe Street, Suite 700
Tallahassee, FL 32301-1549
mrule@att.com

Richard D. Melson
Gabriel E. Nieto
Hopping Green Sams & Smith, PA
Post Office 6526
123 S. Calhoun Street
Tallahassee, FL 32314
rmelson@hgss.com

Floyd Self
Messer Caparello & Self
P.O. Drawer 1876
215 S. Monroe Street, Suite 701
Tallahassee, FL 32302-1876
fself@lawfla.com

Marc Dunbar
Karem M. Camechic
Pennington Moore Wilkinson & Dunar, PA
215 S. Monroe Street, 2nd Floor
Tallahassee, FL 32301
Karen@penningtonlawfirm.com

Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, Tennessee 37069
Carolyn.Marek@twtelecom.com

Mark E. Buechel
Supra Telcom
1311 Executive Center Drive
Koger Center, Ellis Bldg, Suite 200
Tallahassee, FL 32301.5027

Donna Canzano McNulty
325 John Knox Road
The Atrium Bldg., Suite 105
Tallahassee, FL 32303
donna.mcnulty@wcom.com

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
246 E. 6th Avenue
Tallahassee, FL 32303
mgross@fcta.com

Charles J. Rehwinkel
1313 Blair Stone Road
Tallahassee, FL 32301
charles.j.rehwinkel@mail.sprint.com

Brian Sulmonetti
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328
Brian.Sulmonetti@wcom.com

Catherine F. Boone, Regional Counsel
Covad Communications Company
10 Glenlak Parkway, Suite 650
Atlanta, GA 30328-3495
cboone@covad.com

Michael Sloan
Erica Hudson Carden
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116
ehcarden@swidlaw.com
msloan@swidlaw.com

Matthew Feil
Florida Digital Network, Inc.
390 N. Orange Avenue, Suite 2000
Orlando, FL 32801
mfeil@floridadigital.net

Rodney L. Joyce
Shook Hardy & Bacon, LLP
600 14th Street, N.W., Suite 800
Washington, DC 20005-2004
rjoyce@shb.com

Jonathan Canis
Michael Hazzard
Kelley Drye and Warren, LLP
1200 19th St, N.W., Fifth Floor
Washington, DC 20036
mhazzard@kelleydrye.com
jacanis@kelleydrye.com

George S. Ford
Z-Tel Communications, Inc.
601 South Harbour Island Blvd
Tampa, FL 33602
gford@z-tel.com

Virginia Tate
1200 Peachtree Street, Suite 8068
Atlanta, GA 30309
vtate@att.com

Norton Cutler
Michael Bressman
5 Corporate Centre
801 Crescent Centre Drive, Suite 600
Franklin, TN 37067
norton.cutler@bluestar.com

John Spilman
675 Peter Jefferson Parkway, Suite 310
Charlottesville, VA 22911
johnspilman@broadslate.net

Charles Pellegrini
Patrick Wiggins
Katz, Kutter Law Firm
106 East College Avenue, 12th Floor
Tallahassee, FL 32301
cjpellegrini@katzlaw.com
pkwiggins@katzlaw.com

Don Sussman
three Dulles Tech Center
13650 Dulles Technology Drive
Herndon, VA 20171-4602
dsussman@nas-corp.com


Joseph A. McGlothlin