

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 990649B-TP
DATED: MARCH 5, 2002

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of Staff's Response to Sprint-Florida, Incorporated's First Request for Production of Documents (Nos. 1-2) has been furnished to John P. Fons, Ausley & McMullen, P. O. Box 391, Tallahassee, FL 32302, and a true and correct copy was furnished by U.S. Mail and via electronic mail, on this 5th day of March, 2002 to the following:

ACI Corp.
7337 S. Revere Pkwy.
Englewood, CO 80112

Ms. Marsha Rule
AT&T Communications of the
Southern States, Inc.
101 N. Monroe Street, Suite
700
Tallahassee, FL 32301-1549

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

Ms. Kimberly Caswell
Verizon Select Services Inc.,
P.O. Box 110
FLTC0007
Tampa, FL 33601-0110

Ms. Catherine F. Boone
c/o Covad Communications
Company
10 Glenlake Parkway, Ste. 650
Atlanta, GA 30328

Mr. Matthew Feil
Florida Digital Network, Inc.
390 N. Orange Ave., Suite 2000
Orlando, FL 32801

Mr. Scott Sapperstein
Intermedia Communications,
Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309

Mr. Charles Rehwinkel
Sprint-Florida, Inc.
P.O. Box 2214
Tallahassee, FL 32316-2214

DOCUMENT NUMBER-DATE

02565 MAR-5 2002

FPSC-COMMISSION CLERK

STAFF'S RESPONSE TO SPRINT-FLORIDA, INCORPORATED'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-2)
DOCKET NO. 990649B-TP
PAGE 2

Mr. Richard Melson
Ms. Gabriel E. Nieto
Hopping Green Sams and
Smith, P.A.
P.O. Box 6526
Tallahassee, FL 32314

Ms. Donna C. McNulty
MCI WorldCom
325 John Knox Road, Suite 105
Tallahassee, FL 32303

Mr. Brian Sulmonetti
MCI WorldCom
Concourse Corporate Center Six
Six Concourse Parkway, Suite
3200
Atlanta, GA 30328

Mr. Joseph McGlothlin
Ms. Vicki Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold, and Steen, P.A.,
Z-tel Communications, Inc.
117 South Gadsden Street
Tallahassee, FL 32301

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

Mr. Michael A. Gross
Florida Cable
Telecommunications Assoc.,
Inc.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Ms. Monica Barone
Sprint Communications Company
Limited Partnership
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

Mr. Jonathan Canis
Mr. Michael Hazzard
Kelley Drye and Warren, LLP
1200 19th St. NW, Fifth Floor
Washington, DC 20036

Mr. Peter Dunbar
Ms. Karen Camechis
Pennington, Moore, Wilkinson,
Bell & Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302-2095

Mr. Eric J. Branfman
Mr. Morton Posner
Swidler Berlin Shereff
Friedman, LLP
3000 K Street NW, #300
Washington, DC 20007-5116

Ms. Carolyn Marek
Time Warner AxS of Florida,
L.P.
233 Bramerton Court
Franklin, TN 37069

Mr. Mark E. Buechele
Koger Center - Ellis Bldg.
1311 Executive Center Drive
Suite 200
Tallahassee, FL 32301-5027

STAFF'S RESPONSE TO SPRINT-FLORIDA, INCORPORATED'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-2)
DOCKET NO. 990649B-TP
PAGE 3

Mr. Tracy Hatch
Messer, Caparello & Self, P.A.
P.O. Box 1876
Tallahassee, FL 32302-1876

Joseph McGlothlin, Esquire
Z-tel Communications, Inc.
117 South Gadsden Street,
Tallahassee, Florida 32301



JASON K. FUDGE, Senior Attorney

FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(850) 413-6199