

ORIGINAL

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

THE WASHINGTON HARBOUR
3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE (202) 424-7643
WWW.SWIDLAW.COM

NEW YORK OFFICE
THE CHRYSLER BUILDING
405 LEXINGTON AVENUE
NEW YORK, NY 10174
TEL. (212) 973-0111
FAX (212) 891-9598

HARISHA J. BASTIAMPILLAI
DIRECT DIAL: (202) 424-7869
FAX: (202) 424-7643
HJBASTIAMPILLAI@SWIDLAW.COM

March 13, 2002

BY OVERNIGHT MAIL

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

RECEIVED-FPSC
02 MAR 15 AM 11:32
COMMISSION
CLERK

Re: Docket No. 990649B-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Florida Digital Network, Inc. is an original and one copy of the Notice of Service of FDN's First Set of Interrogatories and First Request for Production of Documents to Sprint Florida, Inc. in the above-reference docket.

Please date stamp and return the enclosed extra copy of this filing. Should you have any questions concerning this filing, please do not hesitate to call us.

Respectfully submitted,

Michael Sloan (by HJB)

Eric J. Branfman
Michael C. Sloan
Harisha J. Bastiampillai

- AUS _____
- CAF _____
- CMP _____ Enclosures
- COM _____
- CTR _____ cc: Parties of Record
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC _____
- OTH _____

RECEIVED & FILED

RJM

FPSC-BUREAU OF RECORDS

02 MAR 15 AM 9:29
DISTRIBUTION CENTER

DOCUMENT NUMBER-DATE
03025 MAR 15 02
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing of)
Unbundled Network Elements)
_____)

Docket No. 990649B-TP

**NOTICE OF SERVICE OF FLORIDA DIGITAL NETWORK, INC. OF ITS
FIRST SET OF INTERROGATORIES (1-15) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-2)
TO SPRINT FLORIDA, INC.**

Florida Digital Network, Inc. ("FDN"), by and through its undersigned counsel, hereby files and serves Notice that it has, on this 14th day of March, 2002, served the original of its First Set of Interrogatories (1-15) and First Request for Production of Documents (Nos. 1-2) on Sprint Florida, Inc. ("Sprint") by e-mail on John P. Fons at jfons@ausley.com, and by overnight delivery at John P. Fons, Ausley & McMullen, 227 South Calhoun Street, Tallahassee, Florida 32301. Copies of FDN's Interrogatories and Request for Production of Documents were also on this date served by U.S. Mail on the other parties of record.

DOCUMENT NUMBER-DATE
03025 MAR 15 8
CLERK

Respectfully submitted

By: Michael Sloan (by HB)

Eric J. Branfman

Michael C. Sloan

Harisha J. Bastiampillai

Swidler Berlin Shereff Friedman, LLP

3000 K Street, NW, Suite 300

Washington, DC 20007

Tel: 202/424-7500

Fax: 202/424-7643

e-mail: mcsloan@swidlaw.com

and

Matthew Feil

Florida Digital Network, Inc.

390 North Orange Ave.

Suite 2000

Orlando, FL 32801

(407) 835-0460

mfeil@floridadigital.net

Attorneys for Florida Digital Network, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida Digital Network, Inc.'s Notice of Service of its First Set of Interrogatories and First Request for Production of Documents on Sprint Florida, Inc. in Docket No. 990649B-TP has been served on the following parties by e-mail and U.S. mail this 14th day of March, 2002.



Harisha Bastiampillai

Jason Fudge, Esq.
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Marc W. Dunbar, Esq.
Pennington, Moore, Wilkinson, Bell &
Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302-2095

Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

Charles J. Rehwinkel
Sprint-Florida, Incorporated
MC FLTH00107
P.O. Box 2214
Tallahassee, FL 32399-2214

Claudia Davant-DeLoach, Esq.
AT&T
101 N. Monroe St., Suite 700
Tallahassee, FL 32301

Mark Buechele
Supra Telecom
1311 Executive Center Drive, Suite 200
Tallahassee, FL 32301

Virginia Tate, Esq.
AT&T
1200 Peachtree St., Suite 8068
Atlanta, GA 30309

Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069

Jeffrey Whalen, Esq.
John Fons, Esq.
Ausley Law Firm
P.O. Box 391
Tallahassee, FL 32302

Ms. Wanda Montano
US LEC of Florida, Inc.
6801 Morrison Blvd.
Charlotte, NC 28211-3599

Michael A. Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecommunications Assoc., Inc.
246 E. 6th Avenue
Tallahassee, FL 32301

Kimberly Caswell
Verizon Select Services
P.O. Box 110, FLTC0007
Tampa, FL 33601

Donna McNulty, Esq.
WorldCom
The Atrium Building, Suite 105
325 John Knox Road
Tallahassee, FL 32303

Mr. Brian Sulmonetti
WorldCom, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328

BlueStar Networks, Inc.
Norton Cutler/Michael Bressman
5 Corporate Centre
801 Crescent Centre Drive, Suite 600
Franklin, TN 37067

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

Ms. Catherine F. Boone
Covad Communications Company
10 Glenlake Parkway, Suite 650
Atlanta, GA 30328-3495

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

Vicki Kaufman, Esq.
Joe McGlothlin, Esq.
McWhirter, Reeves, McGlothlin
Davidson, Rief & Bakas, P.A.
117 S. Gadsden Street
Tallahassee, FL 32301

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

Richard D. Melson
Hopping Green Sams & Smith, P.A.
P.O. Box 6526
Tallahassee, FL 32314

John D. McLaughlin., Jr.
1755 North Brown Road
Lawrenceville, GA 30043-8911

Genevieve Morelli
Andrew Klein
Kelley Drye & Warren, LLP
1200 Nineteenth St. N.W.
Washington, D.C. 20036

Jonathan Canis
Michael Huzzard
Kelley, Drye & Warren, LLP
1200 Nineteenth St. N.W.
Washington, D.C. 20036

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

Mr. Don Sussman
Network Access Solutions Corporation
Three Dulles Tech Center
13650 Dulles Technology Drive
Herndon, VA 20171-4602

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

George S. Ford
Z-Tel Communications, Inc.
601 S. Harbour Island Blvd.
Tampa, FL 33602-5706

Andrew O. Isar
Miller Isar, Inc.
7901 Skansie Avenue, Suite 240
Gig Harbour, WA 98335

Michael Sloan
Swidler & Berlin
3000 K Street, N.W., #300
Washington, D.C. 20007-5116

Lisa Korner Butler
Vice President Regulatory & Industry
Affairs
Network Plus, Inc.
41 Pacella Park Drive
Randolph, MA 02368