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Susan S. Masterton Attorney

#### Law/External Affairs

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May 31, 2002

Ms. Blanca S. Bayó, Director Division of the Commission Clerk & Administrative Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0870

Re: Docket No. 020099-TP Sprint-Florida, Incorporated Notice of Service of First Set of Interrogatories (No. 1-15) and First Request for Production of Documents (No. 1-5) to ALEC, Inc.

Dear Ms. Bayó:

Enclosed for filing is the original and one copy of Sprint-Florida, Incorporated's (Sprint):

- 1. Notice of Service of First Set of Interrogatories (No. 1-15) to ALEC, Inc. 05767-02
- 2. Notice of First Request of Production of Documents to (No. 1-5) ALEC, Inc. 05768-02

Copies of this have been served pursuant to the attached Certificate of Service.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Sincerely,

Suby S. notylin

Susan S. Masterton

Enclosures

## BEFORE THE STATE OF FLORIDA PUBLIC SERVICE COMMISSION

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In re: Enforcement of an Interconnection Agreement Between ALEC, Inc. and Sprint-Florida, Inc.

Docket No. 020099-TP

# NOTICE OF FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS OF ALEC, INC. TO SPRINT-FLORIDA, INC.

ALEC, Inc. ("ALEC") hereby gives notice that it has served its First Set of Interrogatories and First Set of Requests for Production of Documents to Sprint-Florida, Inc. ("Sprint"). Answers to the Interrogatories, which must be under oath, and documents responsive to the Requests for Production of Documents must be served on ALEC within 20 days of Sprint's receipt of the Interrogatories and Requests for Production of Documents, in accordance with the Order Establishing Procedure entered in this matter on May 1, 2002, Rule 28-106.206 of the Florida Administrative Code, and Rules 1.340 and 1.350 of the Florida Rules of Civil Procedure.

> DOCUMENT NUMBEP-DATE 05767 MAY 31 원 FPSC-COMMISSION CLERK

Respectfully submitted,

ALEC, Inc.

that · ~ Jon C. Moyle, Jr.

Jon C. Moyle, Jr. Florida Bar No. 727016 Cathy M. Sellers Florida Bar No. 0784958 Moyle, Flanigan, Katz, Raymond & Sheehan, P.A. The Perkins House 118 North Gadsden Street Tallahassee, Florida 32301 Telephone: (850) 681-3828 Facsimile: (850) 681-8788

John C. Dodge David N. Tobenkin Cole, Raywid, & Braverman, L.L.P. 1919 Pennsylvania Avenue, N.W. Washington, D.C. 20006 Telephone: (202) 659-9750 Facsimile: (202) 452-0067

Its Attorneys

Dated: May 31, 2002

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was provided by hand delivery to the following on this 31st day of May, 2002:

Susan Masterton, Esquire Charles R. Rehwinkel Sprint-Florida, Incorporated 1313 Blairstone Road Tallahassee, Florida 32301

Mr. F. B. "Ben" Poag Director, Regulatory Affairs Sprint-Florida, Incorporated Post Office Box 2214 Tallahassee, Florida 32316-2214

Mr. Tobey Schultz Ms. Linda Dodson Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Shh h Jon C. Moyle, Jr.

### CERTIFICATE OF SERVICE DOCKET NO. 020099-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by hand delivery\* or Overnight Mail\*\* this 31st day of May, 2002 to the following:

Volaris Telecom, Inc.\*\* Ms. Judy B. Tinsley c/o DURO Communications, Inc. 3640 Valley Hill Road, N.W. Kennesaw, GA 30152-3238

Cole, Raywid & Braverman, L.L.P.\*\* John C. Dodge/David N. Tobenkin 1919 Pennsylvania Avenue, N.W., #200 Washington, DC 20006

Moyle Law Firm (Tall)\* Jon Moyle/Cathy Sellers 118 North Gadsden Street Tallahassee, Florida 32301

Linda Dodson, Esq.\* Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0870

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Susan S Masterton