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August 27, 2002

Ms. Blanca Bayo, Director  
Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard, Room 110  
Betty Easley Conference Center  
Tallahassee, FL 32399-0850

**VIA HAND DELIVERY**

RECEIVED-FPSC  
AUG 27 PM 4:41  
COMMISSION  
CLERK

Re: Docket No. 020129-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of US LEC of Florida Inc. ("US LEC") are the following documents:

1. Original and one copy of US LEC's Notice of Service of Responses to Staff's First Set of Interrogatories and First Set of Requests for Production of Documents; and *09050-02*
2. Original and one copy of US LEC's Notice of Taking Depositions Duces Tecum. *09051-0*

AUS \_\_\_\_\_  
 CAF \_\_\_\_\_  
 CMP \_\_\_\_\_  
 COM \_\_\_\_\_  
 CTR \_\_\_\_\_  
 ECR \_\_\_\_\_  
 GCL \_\_\_\_\_  
 OPC \_\_\_\_\_  
 MMS \_\_\_\_\_  
 SEC \_\_\_\_\_  
 OTH \_\_\_\_\_

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,



Martin P. McDonnell

MPM/rl  
Enclosures

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FPSC-BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition of US LEC of Florida )
Inc., Time Warner Telecom of Florida, LP )
and ITC^DeltaCom Communications )
objecting to and requesting )
suspension of proposed CCS7 )
Access Arrangement Tariff filed by )
BellSouth Telecommunications, Inc. )
\_\_\_\_\_ )

Docket No. 020129-TP

Filed: August 27, 2002

US LEC OF FLORIDA, INC.'S
NOTICE OF TAKING DEPOSITIONS DUCES TECUM

TO: Patrick Turner, Esq.
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

PLEASE TAKE NOTICE that the undersigned, pursuant to Rule 28Q-106.206, Florida
Administrative Code, and Rule 1.310, Florida Rules of Civil Procedure, will take the oral deposition
of the following individuals on the date and times as indicated. The depositions will be held at 3535
Colonnade Parkway, Conference Room 9A, Birmingham, Alabama.

Table with 3 columns: Date, Deponent, Time. Rows include Bob James, Steve Armstrong, Cathy Kuegel, Ron Waddell, and Thomas Randklev.

AUS
CAF
CMP
COM
CTR
ECR
GCL
OPC
MMS
SEC
OTH

DOCUMENT NUMBER - DATE
09051 AUG 27 02
FPSC-COMMISSION CLERK

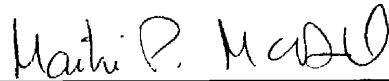
These depositions are being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the applicable rules, before an official court reporter or before a notary public, or some other officer duly authorized by law to take depositions.

The deponent is commanded to have with him/her at the time of his deposition the following documents:

1. All prefiled testimony;
2. Any updates to exhibits and any and all documents relied upon in formulating your testimony.
3. Any and all documents relied upon to develop cost estimates, projections, or calculations to support BellSouth's CCS7 tariff.

DATED this 27<sup>th</sup> day of August, 2002.

Respectfully submitted,



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Kenneth A. Hoffman, Esq.  
Martin P. McDonnell, Esq.  
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Tallahassee, FL 32302  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Proposed Issues was furnished by U. S. Mail and Hand Delivery(\*) to the following this 27th day of August, 2002:

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Adam Teitzman, Esq.  
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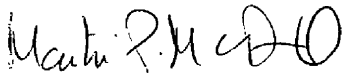
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\_\_\_\_\_  
Martin P. McDonnell, Esq.