## ORIGINAL

### MCWHIRTER REEVES

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

October 25, 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 Nos.: 020119-TP and 020578-TP

Dear Ms. Bayo:

AUS

OTH

On behalf of Florida Competitive Carriers Association, enclosed for filing and distribution are the original and 1 copy of the following:

Notice of Service of Florida Competitive Carriers Association's Third Set of Interrogatories (Nos. 15-20) and Third Requests for Production of Documents (Nos. 9-10) to BellSouth Telecommunications, Inc.

Please acknowledge receipt of the above on the extra copy and return the stamped copy to me. Thank you for your assistance.

Sincerely,

Joseph A. McGlothlin

Joe a. M. Dlothlin

JAM/mls Enclosure OCUMENT NUMBER-DATE
1 1823 OCT 28 8

McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman & Arnold, P.A.

ORIGINAL

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for expedited review and cancellation of BellSouth telecommunications, Inc.'s Key Customer promotional tariffs and for investigation of BellSouth's promotional pricing and marketing practices, by Florida Digital Network, Inc.

Docket No.: 020119-TP

In Re: Petition for expedited review and cancellation Of BellSouth Telecommunications, Inc.'s Key Customer promotional tariffs by Florida Competitive Carriers Association.

Docket No.: 020578-TP

Filed: October 25, 2002

# NOTICE OF SERVICE OF THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S THIRD SET OF INTERROGATORIES (NOS. 15-20) AND THIRD REQUESTS FOR PRODUCTION OF DOCUMENTS (NOS. 9-10) TO BELLSOUTH TELECOMMUNICATIONS, INC.

The Florida Competitive Carriers Association (FCCA) files Notice that it has served its Third Set of Interrogatories (Nos. 15-20) and Third Requests for Production of Documents (Nos. 9-10) by Hand Delivery and electronic Mail to: Nancy B. White c/o Nancy Sims, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301, this 25th day of October 2002.

Joseph A. McGlothlin
Vicki Gordon Kaufman
Timothy J. Perry
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman & Arnold, PA
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 Telephone
(850) 222-5606 Telefax

Attorneys for the Florida Competitive Carriers

DOCUMENT NUMBER - DATE

11823 OCT 28 2

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the Notice of Service of Florida Competitive Carriers Association's Third Set of Interrogatories (Nos. 15-20) and Third Requests for Production of Documents (Nos. 9-10) to BellSouth Telecommunications, Inc. has been furnished by (\*) hand delivery, (\*\*) electronic mail or by U. S. Mail on this 25th day of October 2002 to the following:

(\*) (\*\*)Felicia Banks Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399 fbanks@psc.state.fl.us

(\*\*)Matthew Feil Florida Digital Network 390 North Orange Avenue, Suite 2000 Orlando, Florida 32801 mfeil@floridadigital.net

(\*)(\*\*)Nancy B. White James Meza Patrick Turner c/o Nancy Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, Florida 32301 nancy.sims@bellsouth.com

(\*\*)Karen Camechis Pennington Law Firm 215 S. Monroe Street Post Office Box 10095 Tallahassee, Florida 32302-2095 Karen@penningtonlawfirm.com

(\*\*)Carolyn Marek
Time Warner Telecom of Florida, L.P.
233 Bramerton Court
Franklin, Tennessee 37069
Carolyn.Marek@twtelecom.com

(\*\*)Dana Shaffer XO Florida, Inc. 105 Molly Street, Suite 300 Nashville, Tennessee 37201-2315 dana.shaffer@xo.com

(\*\*)Ken Hoffman Martin McDonnell Marsha Rule Rutledge, Ecenia, Purnell & Hoffman 215 S. Monroe Street, Suite 420 Tallahassee, Florida 32301 Ken@Reuphlaw.com

(\*\*)Greg Lunsford 6801 Morrison Blvd. Charlotte, NC 28211-3599 glunsford@uslec.com

(\*\*)Nanette Edwards
Director of Regulatory Advocacy
& Sr. Attorney
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4092 S. Memorial Parkway
Huntsville, AL 35802

Joseph A. McGlothlin