

RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A ECENIA
RICHARD M ELLIS
KENNETH A HOFFMAN
THOMAS W. KONRAD
MICHAEL G. MAIDA
MARTIN P McDONNELL
J STEPHEN MENTON

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

R. DAVID PRESCOTT
HAROLD F. X. PURNELL
MARSHA E RULE
GARY R. RUTLEDGE
GOVERNMENTAL CONSULTANTS
MARGARET A. MENDUNI
M. LANE STEPHENS

November 20, 2002

Ms. Blanca Bayo, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

HAND DELIVERY

RECEIVED-FPSC
02 NOV 20 PM 3:07
COMMISSION CLERK

Re: Docket Nos. 020119-TP and 020578-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of US LEC of Florida Inc., XO Florida, Inc. and Time Warner Telecom of Florida, L.P. ("Joint Respondents") are the original and one copy of the Joint Respondents' Notice of Service of Responses to BellSouth Telecommunications, Inc.'s Second Set of Requests for Production of Documents.

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.

Respectfully submitted,

Martin P. McDonnell
Martin P. McDonnell

- AUS
CAF
CMP
COM
CTR
ECR
GCL
OPC
MMS
SEC
OTH
MPM/rl
Enclosures
cc: All Parties of Record
USLEC\bayo1120

RECEIVED & FILED

Handwritten initials RLM

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12754 NOV 20 02

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Petition of Florida Digital Network, )  
Inc., for Expedited Review and Cancellation )  
of BellSouth's Telecommunications, Inc.'s ) Docket No. 020119-TP  
Key Customer Promotional Tariffs )  
and For an Investigation of BellSouth )  
Telecommunications, Inc.'s Promotional )  
Pricing and Marketing Practices. )

---

In re: Petition of the Florida Competitive Carriers )  
Association for Expedited Review and Cancellation ) Docket No. 020578-TP  
of BellSouth Telecommunications, Inc.'s Key )  
Customer Promotional Tariffs. )

---

Filed: November 20, 2002

**US LEC OF FLORIDA INC., XO FLORIDA, INC.  
AND TIME WARNER TELECOM OF FLORIDA, L.P.'S  
NOTICE OF SERVICE OF RESPONSES TO  
BELLSOUTH TELECOMMUNICATIONS, INC.'S  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

US LEC of Florida Inc., XO Florida, Inc. and Time Warner Telecom of Florida, L.P., ("Joint Respondents"), by and through their undersigned counsel, hereby file and serve Notice that they have served responses to BellSouth Telecommunications, Inc.'s ("BellSouth") Second Set of Requests for Production of Documents to Joint Respondents, by hand delivery, on Nancy White, c/o Nancy Sims, 150 S. Monroe Street, Suite 400, Tallahassee, Florida 32301, and that a copy of the Joint Respondents' responses have been provided to the parties in this docket in the manner set forth in the attached Certificate of Service, on this 20<sup>th</sup> day of November, 2002.

DOCUMENT NUMBER DATE

12754 NOV 20 02

FPSC-COMMISSION CLERK

Respectfully submitted,

Martin P. McDonnell

Kenneth A. Hoffman, Esq.

Martin P. McDonnell, Esq.

Marsha E. Rule, Esq.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

P. O. Box 551

Tallahassee, FL 32302

(850) 681-6788 (Telephone)

(850) 681-6515 (Telecopier)

Attorneys for US LEC of Florida Inc., XO Florida, Inc. and  
Time Warner Telecom of Florida, L.P.

**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 20th day of November, 2002:

Matthew J. Feil, Esq.  
Florida Digital Network  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801

Karen Camechis, Esq.  
Pennington Law Firm  
P. O. Box 10095  
Tallahassee, FL 32302-2095

Carolyn Marek  
233 Bramerton Court  
Franklin, TN 37069

Dana Shaffer  
105 Molly Street, Suite 300  
Nashville, TN 37201

Nanette Edwards  
ITC DeltaCom  
4092 South Memorial Parkway  
Huntsville, AL 35802

Nancy White(\*)  
c/o Nancy Sims  
BellSouth Telecommunications, Inc.  
150 S. Monroe Street  
Suite 400  
Tallahassee, FL 32301

Felicia Banks, Esq.  
Linda Dodson, Esq.  
Florida Public Service Commission  
Room 370  
2540 Shumard Oak Boulevard  
Tallahassee, FL 3299-0850

Joseph A. McGlothlin, Esq.  
Vicki Gordon Kaufman, Esq.  
McWhirter, Reeves, McGlothlin, Davidson,  
Decker, Kaufman, Arnold & Steen, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301

D. Mark Baxter, Esq.  
Stone & Baxter, LLP  
577 Mulberry Street, Suite 1111  
Macon, Georgia 31201-8256

Rodney Page  
Access Integrated Networks, Inc.  
4885 Riverside Drive, Suite 101  
Macon, Georgia 31210

By: Martin P. McDonnell  
MARTIN P. MCDONNELL, ESQ.

USLEC\keynoticeservice