## MCWHIRTER REEVES

ORIGINAL

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

November 21, 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:

On behalf of Florida Competitive Carriers Association, enclosed for filing and distribution are the original and 15 copies of the following:

 Florida Competitive Carriers Association's Notice Response to BellSouth Telecommunications, Inc.'s Second Request for Production of Documents (Nos. 1-2)

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

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RECEIVED & FILED

FPSC-BUREAU OF RECORDS

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

DOCUMENT NUMBER-DATE

FPSC-COMMISSION CLERK

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: November 21, 2002

## NOTICE OF SERVICE OF THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S RESPONSES TO BELLSOUTH TELECOMMUNICATIONS, INC.' S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-2)

Florida Competitive Carriers Association (FCCA) files Notice that it has served its Reponses to BellSouth Telecommunications, Inc.'s Second Request for Production of Documents (Nos. 1–2) to Florida Competitive Carriers Association by Electronic mail on November 20th, 2002 to: Nancy B. White c/o Nancy Sims, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301, and by Hand delivery on this 21st day of November 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 Association

DOCUMENT NUMBER - DATE

12794 NOV218

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the Notice of Service of Florida Competitive Carriers Association Reponses to BellSouth Telecommunications, Inc.'s Second Request for Production of Documents (Nos. 1–2) has been furnished by (\*) hand delivery, (\*\*) electronic mail and by U. S. Mail on this 21st day of November 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
ITC^Deltacom
4092 S. Memorial Parkway
Huntsville, AL 35802
nedwards@itcdeltacom.com

(\*\*)Floyd R. Self Messer, Caparello & Self, P.A. 215 S. Monroe Street, Suite 701 Tallahassee, FL 32302 fself@lawfla.com

Seeph A. McGlothlin