

ORIGINAL



April 8, 2003

Ms. Blanca Bayó, Director
Division of the Commission Clerk
& Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

via Overnight Mail

Re: Docket No. 981834-TP Petition of Competitive Carriers For Commission action to support local Competition in BellSouth Telecommunications, Inc.'s service territory.

Re: Docket No. 990321-TP Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation to insure that BellSouth Telecommunications, Inc., Sprint-Florida, Inc., and GTE-Florida, Inc. comply with obligations to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation.

Dear Ms. Bayó,

Please find enclosed for filing in the above dockets an original and seven (7) copies of Florida Digital Network, Inc.'s Notice of Adoption of ITC DeltaCom's and Covad's Objections to The Florida Commission Staff's First Request for Production of Documents (No. 1) and, if necessary, Motion to Accept Late-filed General Objections.

If you have any questions regarding the enclosed, please call me at 407-835-0460.

Sincerely,

Matthew Feil
Florida Digital Network
General Counsel

AUS
CAF
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COM
CTR
ECR
GCL
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SEC
OTH

DOCUMENT NUMBER - DATE
03319 APR -98
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LOCAL LONG DISTANCE INTERNET

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers)
For Commission action to support local) Docket No. 981834-TP
Competition in BellSouth Telecommu-)
nications, Inc.'s service territory)
_____)

In re: Petition of ACI Corp. d/b/a)
Accelerated Connections, Inc. for generic) Docket No. 990321-TP
investigation to insure that BellSouth)
Telecommunications, Inc., Sprint-Florida,)
Inc., and GTE-Florida, Inc. comply with)
obligations to provide alternative local ex-)
change carriers with flexible, timely, and)
cost-efficient physical collocation.)
_____)

**FLORIDA DIGITAL NETWORK, INC.'S NOTICE OF ADOPTION OF ITC
DELTA COM'S AND COVAD'S OBJECTIONS TO
THE FLORIDA COMMISSION STAFF'S FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS (NO. 1) AND, IF NECESSARY, MOTION TO ACCEPT LATE-
FILED GENERAL OBJECTIONS**

1. Florida Digital Network, Inc. ("FDN"), pursuant to Rule 28-106.206, Florida Administrative Code and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby submits as its general objections to the Florida Commission Staff's First Request for Production of Documents (Nos. 1) the objections already made by ITC Delta Com and Covad to identical discovery served on those parties. FDN adopts the objections filed with the Commission on April 4, 2003, by ITC Delta Com and Covad.

2. If necessary, FDN moves the Commission to accept FDN's general objections filed late. FDN maintains that since its objections are identical to those already filed by other ALECs to identical questions, are served by email only two business days after those of the other ALECs were filed, and the ten-day objections filed by parties are

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typically very broad and general in nature, no prejudice should result to staff from the brief delay.

3. FDN has consulted with staff counsel regarding this matter and represents that staff counsel has no objection to this FDN filing.

Respectfully submitted, this 8th day of April 2003.

A handwritten signature in cursive script, appearing to read "Matthew Feil", written over a horizontal line.

Matthew Feil
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CERTIFICATE OF SERVICE
Docket No. 981834-TP and 990321-TP

I hereby certify that a copy of the foregoing was sent by e-mail and regular mail to the persons listed below, other than those marked with an (*) who have been sent a copy via overnight mail, this 8th day of April, 2003.

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