

ORIGINAL

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PLEASE REPLY TO:
TALLAHASSEE

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX

April 14, 2003

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COMMISSION
CLERK

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 No.: 981834-TP and 990321-TP

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), enclosed for filing and distribution are the original and 1 copy of the following:

- ▶ Notice of Service of DIECA Communications, Inc. d/b/a Covad Communications Company's Response to Staff's First Request for Production of Documents (No. 1).

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

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

AUS _____
 CAF _____
 CMP _____
 COM _____
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 ECR _____
 GCL _____
 OPC _____
 MMS _____
 SEC _____
 OTH _____

_____ VGK/bae
 _____ Enclosure

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TH
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER DATE
03428 APR 14 8
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers
for Commission action to support local
competition in BellSouth Telecommunications,
Inc.'s service territory

Docket No. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated
Connections, Inc. for generic investigation to
ensure that BellSouth Telecommunications,
Inc., Sprint-Florida, Incorporated, and GTE
Florida Incorporated comply with obligation
to provide alternative local exchange carriers
with flexible, timely, and cost-efficient
physical collocation

Docket No. 990321-TP
Filed: April 14, 2003

**NOTICE OF SERVICE OF DIECA COMMUNICATIONS, INC. D/B/A COVAD
COMMUNICATIONS COMPANY'S RESPONSE TO STAFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS (NO. 1)**

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad) files
Notice that it has served its Response to Staff's First Request for Production of Documents (No.
1) by hand delivery to: Beth Keating, Florida Public Service Commission, Gerald L. Gunter
Building, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, on this 14th day of
April, 2003.

Charles (Gene) Watkins
Covad Communications Co.
1230 Peachtree Street, N.E., 19th Floor
Atlanta, GA 30309
(404) 942-3494
(404) 942-3495 (fax)
g Watkins@covad.com

COVAD COMMUNICATIONS COMPANY


Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
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(850) 222-5606 (fax)
vkaufman@mac-law.com

Attorneys for Covad Communications Company

DOCUMENT NUMBER - DATE

03428 APR 14 03

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Service of DIECA Communications Inc. d/b/a Covad Communications Company's Response to Staff's First Request for Production of Documents (No. 1) has been furnished by (*) hand delivery, or U.S. Mail this 14th day of April, 2003, to the following: ..

(*) Beth Keating
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Accelerated Connections, Inc.
7337 South "Revere Parkway
Englewood, CO 33414

Jeff Wahlen
Ausley Law Firm
Post Office Box 391
Tallahassee, Florida 32302

Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

Terry Monroe/Genevieve Morelli
CompTel
1900 M Street, NW
Suite 800
Washington, DC 20036

Michael A. Gross
Florida Cable Telecommunications
Association, Inc.
246 East 6th Avenue, Suite 100
Tallahassee, Florida 32303

Richard Melson
Hopping Law Firm
Post Office Box 6526
Tallahassee, Florida 32314

Nanette S. Edwards
ITC DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802-4343

Donna C. McNulty
1203 Governors Square Boulevard
Suite 201
Tallahassee, Florida 32301

Charles Pellegrini/Patrick Wiggins
Katz, Kutter Law Firm
12th Floor
106 East College Avenue
Tallahassee, Florida 32301

Laura L. Gallagher
MediaOne
101 E. College Avenue, Suite 302
Tallahassee, Florida 32301

Don Sussman
Network Access Solutions Corporation
Three Dulles Tech Center
13650 Dulles Technology Drive
Herndon, VA 20171-4602

Peter Dunbar
Pennington Law Firm
Post Office Box 10095
Tallahassee, Florida 32301

Susan Masterton/Charles Rehwinkel
Sprint Communications Company
Post Office Box 2214
MC: FLTLHO0107
Tallahassee, Florida 32316-2214

Ann Shelfer
Supra Telecommunications
1311 Executive Center Drive, Suite 200
Tallahassee, Florida 32301

Andrew Isar
Telecommunications Resellers Assoc.
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98335

Floyd Self
Messer Caparello & Self
215 S. Monroe Street, Suite 701
Tallahassee, FL 32302-1876

Virginia Tate
AT&T Communications
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, GA 30309

Matthew Feil
Florida Digital Network, Inc.
390 North Orange Avenue, Suite 2000
Orlando, Florida 32801

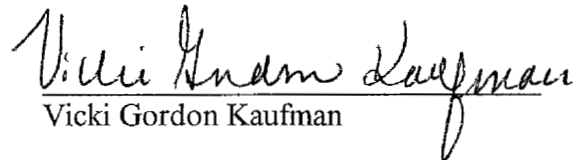
Robert Waldschmidt
Howell & Fisher
Court Square Building
300 James Robertson Parkway
Nashville, TN 37201

Richard Heatter
Mpower Communications Corp.
175 Sully's Trail, Suite 300
Pittsford, NY 14534

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Shook, Hardy & Bacon LLP
600 14th Street, NW
Suite 800
Washington, DC 20005

Kimberly Caswell
Verizon Select Services, Inc.
Post Office Box 110
FLTC0007
Tampa, Florida 33601-0110

C. Ronis/D. McCuaig/J. Frankel
Wilmer Law Firm
2445 M. Street, NW
Washington, DC 20037


Vicki Gordon Kaufman