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Tracy Hatch Senior Attorney Law and Government Affairs Southern Region Suite 700 101 N. Monroe Street Tallahassee, FL 32301 850-425-6360

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May 21, 2003

BY HAND DELIVERY Ms. Blanca Bayó, Director

The Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket Nos. 981834-TP and 990321-TP

Dear Ms. Bayó:

Enclosed for filing are an original and one copy of AT&T Communications of the Southern States, LLC's Preliminary Objections to Verizon's Third Set of Interrogatories and Second Request for Production of Documents to AT&T in the above-referenced docket.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to Lisa Riley in the enclosed stamped envelope.

Thank you for your assistance with this filing.

Sincerely yours,

RECEIVED & FIL

FPSC-BUREAU OF RECORDS

Thacy Hatch/las

Tracy W. Hatch

TWH/las Enclosure cc: Parties of Record

AUS

CMP COM CTR

ECR

GCI

OPC

MMS

OTH

03 WW 22 XAN 20 DOCUMENT NUMBER-DATE 012141801100 CENTER

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission) Docket No. 981834-TP
Action to Support Local Competition in BellSouth)
Telecommunications Inc.'s Service Territory)
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: May 21, 2003))))

NOTICE OF SERVICE OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S GENERAL OBJECTIONS TO VERIZON'S THIRD SET OF INTERROGATORIES (NOS. 22-35)

NOTICE IS HEREBY GIVEN that a true and correct copy of AT&T Communications of the Southern States, LLC's Responses to Verizon's Third Set of Interrogatories (Nos. 22-35), which were legally propounded by Verizon on May 13, 2003, was sent via electronic mail and overnight delivery to Richard A. Chapkis at <u>Richard.Chapkis@verizon.com</u> and to Verizon's offices located at One Tampa City Center, 201 North Franklin Street, P.O. Box 110, MC FLTC0007, Tampa, Florida 33601-0110.

The original and one copy of this Notice were also sent via overnight delivery on

May 21, 2003 to the Director, Division of the Commission Clerk and Administrative Services,

at the Commission. Further service on other parties of record is as set forth on the Certificate

of Service, appended hereto.

Respectfully submitted on May 21, 2003.

Trang Hoten las By:

Tracy W. Hatch, Esq. AT&T Communications of the Southern States, LLC 101 N. Monroe Street, Suite 700 Tallahassee, FL 32301 (850) 425-6360

Attorney for AT&T Communications of the Southern States, LLC

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 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. 981834-TP

Docket No. 990321-TP Filed: May 21, 2003

NOTICE OF SERVICE OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC's GENERAL OBJECTIONS TO VERIZON'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 4-5)

NOTICE IS HEREBY GIVEN that a true and correct copy of AT&T Communications of

the Southern States, LLC's Responses to Verizon's Second Request for Production of

Documents (Nos. 4-5), which were legally propounded by Verizon on May 13, 2003, was sent

via electronic mail and overnight delivery to Richard A. Chapkis at

Richard.Chapkis@verizon.com and to Verizon's offices located at One Tampa City Center, 201

North Franklin Street, P.O. Box 110, MC FLTC0007, Tampa, Florida 33601-0110.

The original and one copy of this Notice were also sent via overnight delivery on

May 21, 2003 to the Director, Division of the Commission Clerk and Administrative Services,

at the Commission. Further service on other parties of record is as set forth on the Certificate

of Service, appended hereto.

Respectfully submitted on May 21, 2003.

By:

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Tracy W. Hatch, Esq. AT&T Communications of the Southern States, LLC 101 N. Monroe Street, Suite 700 Tallahassee, FL 32301 (850) 425-6360

Attorney for AT&T Communications of the Southern States, LLC

CERTIFICATE OF SERVICE DOCKET NOS. 981834 & 990321

I HEREBY CERTIFY that a copy of the foregoing has been furnished via

U.S. Mail this 21st day of May, 2003, to the following parties of record:

Mayne Knight	ALLTEL Communications Convises Inc.
Wayne Knight	ALLTEL Communications Services, Inc.
Staff Counsel Florida Public Service Commission	Bettye Willis
	One Allied Drive
2540 Shumard Oak Boulevard	Little Rock, AR 72203-2177
Tallahassee, FL 32399-0850	Phone: (501) 905-8330
	Fax: (501) 905-6299
Ausley Law Firm	BellSouth Telecommunications, Inc.
Jeffry Wahlen	Nancy B. White
P.O. Box 391	c/o Ms. Nancy H. Sims
Tallahassee, FL 32302	150 South Monroe Street, Suite 400
Phone: 850-224-9115	Tallahassee, FL 32301-1556
Fax: 222-7560	Phone: (850) 224-7798
	Fax: 222-8640
Florida Digital Network, Inc.	··· · · ·
Matthew Feil, Esq.	Hopping Law Firm
390 North Orange Ave., Suite 2000	Richard Melson
Orlando, FL 32801	P.O. Box 6526
Phone: (407) 835-0460	Tallahassee, FL 32314
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Email: mfeil@floridadigital.net	Fax: 224-8551
Florida Cable Telecom. Assoc., Inc.	Florida Competitive Carriers Assoc.
Michael A. Gross	c/o McWhirter Law Firm
246 E. 6th Avenue, Suite 100	Vicki Kaufman
Tallahassee, FL 32303	117 S. Gadsden St.
Phone: 850-681-1990	Tallahassee, FL 32301
Fax: 681-9676	Phone: 850-222-2525
Email: mgross@fcta.com	Fax: 222-5606
ITC^DeltaCom	KMC Telecom, Inc.
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	Email: <u>imclau@kmctelecom.com</u>
Sprint-Florida, Inc.	MCI WorldCom Communications, Inc.
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PO BOX 2214, MC FLTLHO0107	1203 Governors Square Blvd., Suite 201
Tallahassee, FL 32316-2214	Tallahassee, FL 32301-2960
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Fax: 407-814-5700	Fax: 219-1018
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Network Telephone Corporation	Pennington Law Firm
Brent E. McMahan	Peter Dunbar/ Marc Dunbar

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Paul Turner
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Verizon Florida Inc.
Mr. Richard Chapkis
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Tampa, FL 33601
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c/o Laura L. Gallagher, P.A.
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Tracy W. Hatch

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