

ORIGINAL

MCWHIRTER REEVES
ATTORNEYS AT LAW

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

September 15, 2003

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

RECEIVED 11:00
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COMMISSION
CLERK

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:

- 08715-03 ▶ Notice of Service of DIECA Communications, Inc. d/b/a Covad Communications Company's Second Set of Interrogatories to Verizon Florida, Inc. (Nos. 6 - 31) and Second Request for Production of Documents to Verizon Florida, Inc. (No. 2);
- 08716-03 ▶ Notice of Service of DIECA Communications, Inc. d/b/a Covad Communications Company's Second Set of Interrogatories to Sprint-Florida, Incorporated (Nos. 6 - 24) and Second Request for Production of Documents to Sprint-Florida, Incorporated (No. 2); and,
- 08717-03 ▶ Notice of Service of DIECA Communications, Inc. d/b/a Covad Communications Company's Second Set of Interrogatories to BellSouth Telecommunications (Nos. 6 - 31) and Second Request for Production of Documents to BellSouth Telecommunications (No. 2).

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Ms. Blanca Bayo
September 15, 2003
Page 2

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,

A handwritten signature in black ink, appearing to read "Timothy J. Perry". The signature is stylized with a large, looping initial "T" and "P".

Timothy J. Perry

TJP/bae
Enclosure

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

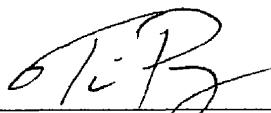
In re: Petition of ACI Corp. d/b/a Accelerated
Connections, Inc. for generic investigation to
ensure that BellSouth Telecommunications,
Inc., Sprint-Florida, Incorporated, and GTE
Florida Incorporated comply with obligation
to provide alternative local exchange carriers
with flexible, timely, and cost-efficient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

Docket No. 990321-TP

Filed: September 15, 2003

NOTICE OF SERVICE OF
DIECA COMMUNICATIONS, INC. D/B/A COVAD COMMUNICATIONS
COMPANY'S SECOND SET OF INTERROGATORIES
TO VERIZON FLORIDA, INC. (NOS. 6 - 31)
AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
TO VERIZON FLORIDA, INC. (NO. 2)

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), files Notice that it has served its Second Set of Interrogatories to Verizon Florida, Inc. (Nos. 6 - 31) and Second Request for Production of Documents to Verizon Florida, Inc. (No. 2), by Electronic Mail and Federal Express to: Richard Chapkis, Verizon Florida, Inc., 201 North Franklin Street, MC FLTC0717, Tampa Florida 33602 and Catherine Ronis/Daniel McCuaig, Wilmer Law Firm, 2445 M. Street, NW, Washington, DC 20037 on this 15th day of September 2003.



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

Vicki Gordon Kaufman
Timothy J. Perry
McWhirter, Reeves, McGlothlin, Davidson,
Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525
(850) 222-5606 (fax)
vkaufman@mac-law.com

Attorneys for Covad Communications Company

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 Second Set of Interrogatories to Verizon Florida, Inc. (Nos. 6 - 31) and Second Request for Production of Documents to Verizon Florida, Inc. (No. 2) has been furnished by (*) hand delivery, (**) electronic mail (***) Federal Express or U.S. Mail this 15th day of September 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

(**) 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

(**) (***) Richard Chapkis
Verizon Select Services, Inc.
201 North Franklin Street
FLTC0717
Tampa, Florida 33602

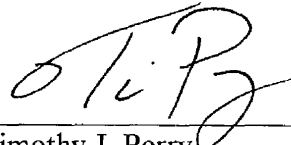
(**) Andrew Isar
Telecommunications Resellers Assoc.
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98335

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

(**) 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



Timothy J. Perry

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

(**) Rodney Joyce
Shook, Hardy & Bacon LLP
600 14th Street, NW
Suite 800
Washington, DC 20005