

ORIGINAL

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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 'Tim Perry', written in a cursive style.

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

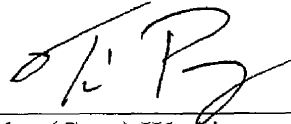
NOTICE OF SERVICE OF
DIECA COMMUNICATIONS, INC. D/B/A COVAD COMMUNICATIONS
COMPANY'S SECOND SET OF INTERROGATORIES
TO BELLSOUTH TELECOMMUNICATIONS (NOS. 6- 31)
AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
TO BELLSOUTH TELECOMMUNICATIONS (NO. 2)

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), files Notice that it has served its Second Set of Interrogatories to BellSouth Telecommunications, Inc. (Nos 6- 31) and Second Request for Production of Documents to BellSouth Telecommunications (No. 2), by hand delivery and electronic mail to: Nancy White c/o Nancy Sims, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301, on this 15th day of September 2003.

DOCUMENT NUMBER-DATE

08717 SEP 15 8

FPSC-COMMISSION CLERK



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.
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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 BellSouth Telecommunications (Nos. 6 -31) and Second Request for Production of Documents to BellSouth Telecommunications (No. 2) has been furnished by (*) and delivery, (**) electronic mail 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
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4092 South Memorial Parkway
Huntsville, AL 35802-4343

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

(**) Laura L. Gallagher
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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 Caparelo & 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

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

(**) Richard Chapkis
Verizon Select Services, Inc.
201 North Franklin Street
Post Office Box 110
MC FLTC0717
Tampa, Florida 33601



Timothy J. Perry