

ORIGINAL



Tracy Hatch  
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Suite 700  
101 N. Monroe Street  
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850-425-6360

September 16, 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

RECEIVED - FPSC  
08 SEP 17 PM 2:09  
COMMISSION  
CLERK

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 Notice of Serving Responses to Staff's Fourth Request for Production of Documents 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 & FILED

FPSC-BUREAU OF RECORDS

*Tracy Hatch/las*  
Tracy W. Hatch

TWH/las

Enclosure

cc: Parties of Record

AUS  
CAF  
CMP  
COM  
CTR  
ECR  
GCL  
OPC  
MMS  
SEC  
OTH

DOCUMENT NUMBER-DATE

08855 SEP 17 03

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
<hr/> 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 16, 2003

**NOTICE OF SERVICE OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC's  
RESPONSES TO STAFF'S FOURTH REQUEST FOR PRODUCTION OF  
DOCUMENTS (NO. 46)**

NOTICE IS HEREBY GIVEN that a true and correct copy of AT&T Communications of the Southern States, LLC's Responses to Staff's Fourth Request for Production of Documents (No. 46), which was legally propounded by Staff on August 26, 2003, was sent via overnight delivery and electronic mail ([ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)) on September 16, 2003, to Adam Teitzman, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850.

The original and one copy of this Notice were also sent via overnight delivery on September 16, 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 September 16, 2003.

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

**CERTIFICATE OF SERVICE  
DOCKET NOS. 981834 & 990321**

I HEREBY CERTIFY that a copy of the foregoing has been furnished via  
U.S. Mail this 16<sup>th</sup> day of September, 2003, to the following parties of record:

<p>Adam Teitzman Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850</p>	<p>Shook, Hardy &amp; Bacon, LLP Rodney L. Joyce 600 14<sup>th</sup> Street N.W., Suite 800 Washington, DC 20005-2004 Phone: (202) 639-5602 Fax: (202) 783-4211</p>
<p>Ausley Law Firm Jeffry Wahlen P.O. Box 391 Tallahassee, FL 32302 Phone: 850-224-9115 Fax: 222-7560</p>	<p>BellSouth Telecommunications, Inc. Nancy B. White c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556 Phone: (850) 224-7798 Fax: 222-8640</p>
<p>Florida Digital Network, Inc. Matthew Feil, Esq. 390 North Orange Ave., Suite 2000 Orlando, FL 32801 Phone: (407) 835-0460 Fax: (407) 835-0309 Email: <a href="mailto:mfeil@floridadigital.net">mfeil@floridadigital.net</a></p>	<p>Hopping Law Firm Richard Melson P.O. Box 6526 Tallahassee, FL 32314 Phone: 850-222-7500 Fax: 224-8551</p>
<p>Florida Cable Telecom. Assoc., Inc. Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303 Phone: 850-681-1990 Fax: 681-9676 Email: <a href="mailto:mgross@fcta.com">mgross@fcta.com</a></p>	<p>Florida Competitive Carriers Assoc. c/o McWhirter Law Firm Vicki Kaufman 117 S. Gadsden St. Tallahassee, FL 32301 Phone: 850-222-2525 Fax: 222-5606</p>
<p><u>ITC^DeltaCom</u> Ms. Nanette S. Edwards 4092 S. Memorial Parkway Huntsville, AL 35802-4343 Email: <a href="mailto:Nedwards@itcdeltacom.com">Nedwards@itcdeltacom.com</a></p>	<p>KMC Telecom, Inc. Mr. John D. McLaughlin, Jr. 1755 North Brown Road Lawrenceville, GA 30043-8119 Phone: (678) 985-6262 Fax: (678) 985-6213 Email: <a href="mailto:jmclau@kmctelecom.com">jmclau@kmctelecom.com</a></p>
<p>Sprint-Florida, Inc. F.B. (Ben) Poag PO BOX 2214, MC FLTLHO0107 Tallahassee, FL 32316-2214 Phone: 850-599-1027 Fax: 407-814-5700</p>	<p><u>MCI WorldCom Communications, Inc.</u> Ms. Donna C. McNulty 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960 Phone: (850) 219-1008 Fax: 219-1018 Email: <a href="mailto:donna.mculty@wcom.com">donna.mculty@wcom.com</a></p>

<p>Network Telephone Corporation  Brent E. McMahan  815 South Palafox Street  Pensacola, FL 32501-5937  Phone: (850) 432-4855  Fax: (850) 437-0724</p>	<p>Pennington Law Firm  Peter Dunbar/ Marc Dunbar  P.O. Box 10095  Tallahassee, FL 32302  Phone: 850-222-3533  Fax: 222-2126</p>
<p>Sprint Communications Company Limited Partnership  Susan S. Masterton  P.O. Box 2214  MC: FLTLHO0107  Tallahassee, FL 32316-2214  Phone: (850) 847-0244  Fax: 878-0777  Email: <a href="mailto:susan.masterton@mail.sprint.com">susan.masterton@mail.sprint.com</a></p>	<p>Supra Telecommunications &amp; Information Systems, Inc.  Paul Turner  2620 S.W. 27th Avenue  Miami, FL 33133  Phone: 305-531-5286  Fax: 305-476-4282</p>
<p>Covad Communications  William H. Weber / Gene Watkins  19<sup>th</sup> Floor  1230 Peachtree Street N.E.  Atlanta, GA 30309  Phone: (404) 942-3494  Fax: (404) 942-3495</p>	<p>Verizon Florida Inc.  Mr. Richard Chapkis  201 N. Franklin Street, MCFLTC0007  Tampa, FL 33601  Phone: (813) 483-2606  Fax: (813) 204-8870</p>
<p>Beth Keating, Esq.  Division of Legal Services  Florida Public Service Commission  2540 Shumard Oak Boulevard  Tallahassee, FL 32399-0870</p>	<p>MediaOne Florida Telecom., Inc.  c/o Laura L. Gallagher, P.A.  101 E. College Ave., Suite 302  Tallahassee, FL 32301</p>
<p>BellSouth Telecom., Inc.  Patrick W. Turner/R. Douglas Lackey  675 W. Peachtree St., Suite 4300  Atlanta, GA 30375</p>	<p>Messer Law Firm  Floyd Self/Norman Horton  PO BOX 1876  Tallahassee, FL 32302</p>
<p>Verizon Florida Inc.  Ms. Michelle A. Robinson  c/o Mr. David Christian  106 East College Avenue, Suite 810  Tallahassee, FL 32301-7704  Phone: (813) 483-2526  Fax: (813) 223-4888  Email: <a href="mailto:Michelle.Robinson@verizon.com">Michelle.Robinson@verizon.com</a></p>	<p>Daniel McCuaig  Wilmer Cutler &amp; Pickering  2445 M Street, N.W.  Washington, DC 20037-1420</p>
<p>J.P. Carver  BellSouth Telecommunications, Inc.  150 S. Monroe Street, Suite 400  Tallahassee, FL 32301-1556</p>	

Tracy Hatch

Tracy W. Hatch