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October 14, 2003

Ms. Blanca S. Bayo, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 030851-TP

> Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Local Circuit Switching for Mass Market Customers

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of Verizon Florida Inc.'s Notices of Service of Initial Objections to AT&T Communications of the Southern States, LLC's First Request for Production of Documents (Nos. 1-31) and First Set of Interrogatories (Nos. 1-111) in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-1256.

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

Sincerely.

Richard M. Chaples

Richard A. Chapkis

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ECR GCL OPC MMS SEC Enclosures

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#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising	- )	Docket No. 030851-TP
from Federal Communications Commission's	)	Filed: October 14, 2003
Triennial UNE review: Local Circuit Switching	)	
for Mass Market Customers	)	
	_ )	

# NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S INITIAL OBJECTIONS TO AT&T'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-31)

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Initial Objections to AT&T's First Request for Production of Documents (Nos. 1-31) was sent via electronic mail and overnight delivery on October 14, 2003, to Tracy Hatch, AT&T, 101 N. Monroe, Suite 700, Tallahassee, FL 32301 and Lisa A. Sapper, AT&T, 1200 Peachtree Street, NE, Suite 8100, Atlanta, GA 30309.

The original and one copy of this Notice were also sent via overnight delivery on October 14, 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 October 14, 2003.

By:

Richard M. Chaples

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Attorney for Verizon Florida Inc.

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#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising	)	Docket No. 030851-TP
from Federal Communications Commission's	)	Filed: October 14, 2003
Triennial UNE review: Local Circuit Switching	)	
for Mass Market Customers	)	
	)	

## NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S INITIAL OBJECTIONS TO AT&T'S FIRST SET OF INTERROGATORIES (NOS. 1-111)

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Initial Objections to AT&T's First Set of Interrogatories (Nos. 1-111) was sent via electronic mail and overnight delivery on October 14, 2003, to Tracy Hatch, AT&T, 101 N. Monroe, Suite 700, Tallahassee, FL 32301 and Lisa A. Sapper, AT&T, 1200 Peachtree Street, NE, Suite 8100, Atlanta, GA 30309.

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Tel: 813-483-1256 Fax: 813-273-9825

e-mail: richard.chapkis@verizon.com

Attorney for Verizon Florida Inc

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Notices of Service and Initial Objections to AT&T's First Request for Production of Documents (Nos. 1-31) and First Set of Interrogatories (Nos. 1-111) in Docket No. 030851-TP were sent via electronic mail and overnight delivery on October 14, 2003 to:

Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Nancy White c/o Nancy Sims BellSouth Telecomm. Inc. 150 S. Monroe Street, Suite 400 Tallahassee, FL 32301-1556

> Tracy Hatch AT&T 101 N. Monroe, Suite 700 Tallahassee, FL 32301

Michael Gross Florida Cable Telecomm. Assn. 246 East 6<sup>th</sup> Avenue Tallahassee, FL 32303

> Susan Masterton Charles Rehwinkel Sprint-Florida 1313 Blairstone Road MC FLTLHO0107 Tallahassee, FL 32301

Donna McNulty MCI WorldCom, Inc. 1203 Governors Square Blvd. Suite 201 Tallahassee, FL 32301-2960

Lisa A. Sapper AT&T 1200 Peachtree Street, NE Suite 8100 Atlanta, GA 30309 Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter Reeves Law Firm 117 South Gadsden Street Tallahassee, FL 32301

Floyd Self Messer Caparello & Self 215 S. Monroe Street Suite 701 Tallahassee, FL 32301

Marva Brown Johnson KMC Telecom III, LLC 1755 North Brown Road Lawrenceville, GA 30034-8119

Nanette Edwards ITC^DeltaCom 4092 S. Memorial Parkway Huntsville, AL 35802

Jeffrey J. Binder Allegiance Telecom Inc. 1919 M Street, NW Washington, DC 20037

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