

ORIGINAL

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PLEASE REPLY TO:  
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TALLAHASSEE OFFICE:  
117 SOUTH GADSDEN  
TALLAHASSEE, FLORIDA 32301  
(850) 222-2525  
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October 30, 2003

VIA HAND DELIVERY

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

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OCT 30 PM 4:43  
COMMISSION  
CLERK

Re: Docket No.: 030851-TP

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), enclosed for filing and distribution is 1 highlighted **CONFIDENTIAL** version of the DIECA Communications, Inc. d/b/a Covad Communications Company's Responses to BellSouth Telecommunications, Inc.'s First Request for Production of Documents (Nos. 1-21) and First Set of Interrogatories (Nos. 1 - 84). Also enclosed are the original and 15 copy of the following:

- ▶ Notice of Service of DIECA Communications, Inc. d/b/a Covad Communications Company's Responses to BellSouth Telecommunications, Inc.'s First Request for Production of Documents (Nos. 1 - 21) and First Set of Interrogatories (Nos. 1 - 84).

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,

*Wicki Gordon Kaufman*

Wicki Gordon Kaufman

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VGK/bae

*Confidential*  
DOCUMENT NO.  
10793-03  
MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, KAUFMAN & ARNOLD, P.A.  
10.30.03

*Redacted*  
DOCUMENT NO.  
10794-03  
10.30.03

*Claim*  
DOCUMENT NO.  
10792-03  
10.30.03

*Notice of Service*  
DOCUMENT NO.  
10772-03  
10.30.03

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

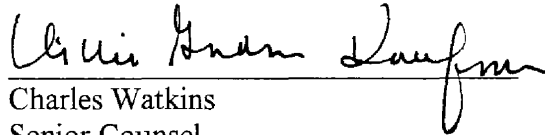
In re: Implementation of requirements arising  
From Federal Communications Commission  
Triennial UNE review: Local Circuit Switching  
For Mass Market Customers

Docket No. 030851-TP  
Filed: October 30, 2003

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**NOTICE OF SERVICE OF DIECA COMMUNICATIONS, INC.  
D/B/A COVAD COMMUNICATIONS COMPANY'S  
RESPONSES TO BELL SOUTH TELECOMMUNICATIONS, INC.'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1 - 21) AND  
FIRST SET OF INTERROGATORIES (NOS. 1 - 84)**

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad) files Notice that it has served its Responses to BellSouth Telecommunications, Inc.'s First Request for Production of Documents (Nos. 1 - 21) and BellSouth Telecommunications, Inc.'s First Set of Interrogatories (Nos. 1 - 84) by e-mail and hand delivery to: Nancy White c/o Nancy Sims, 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301, Tallahassee, Florida 32399-0850, on this 30<sup>th</sup> day of October 2003.



Charles Watkins  
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Attorneys for DIECA Communications, Inc.  
d/b/a Covad Communications, Company

DOCUMENT NO. 10772-03 10.30.03
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## 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 objections to BellSouth Telecommunications, Inc.'s First Request for Production of Documents (Nos. 1 – 21) and First Set of Interrogatories (Nos. 1 – 84) has been provided by (\*) hand delivery, (\*\*) email and U S Mail this 30th day of October 2003, to the following:

(\*\*) Adam Teitzman, Staff Counsel  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

(\*) (\*\*) Nancy White  
c/o Nancy Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301-1556

(\*\*) Richard Chapkis  
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201 North Franklin Street  
MC: FLTC0717  
Tampa, Florida 33602

(\*\*) Susan Masterton  
Sprint Communications Company  
1313 Blairstone Road  
Post Office Box 2214  
MC: FLTLHO0107  
Tallahassee, Florida 32301

(\*\*) Donna Canzano McNulty  
MCI WorldCom  
1203 Governors Square Boulevard  
Suite 201  
Tallahassee, Florida 32301

(\*\*) Norman H. Horton, Jr.  
215 South Mornoe Street  
Tallahassee, Florida 32302-1876

(\*\*) Tracy Hatch  
AT&T Communications of the  
Southern States, LLC  
101 North Monroe Street  
Suite 700  
Tallahassee, Florida 32301

(\*\*) Michael Gross  
Florida Cable Telecommunications  
246 East 6<sup>th</sup> Avenue  
Tallahassee, Florida 32302

(\*\*) Matthew Feil  
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390 North Orange Avenue, Suite 2000  
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(\*\*) Jeffrey J. Binder  
Allegiance Telecom, Inc.  
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Washington, DC 20037

(\*\*) Floyd R. Self  
Messer, Caparello & Self  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32301

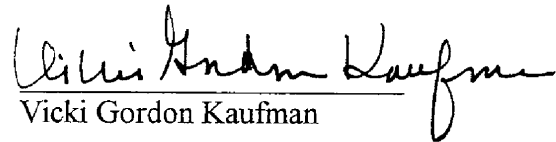
(\*\*) Nanette Edwards  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802

(\*\*) Jake E. Jennings  
Senior Vice-President  
Regulatory Affairs & Carrier Relations  
NewSouth Communications Corp.  
NewSouth Center  
Two N. Main Center  
Greenville, SC 29601

(\*\*) Jon C. Moyle, Jr.  
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& Sheehan, P.A.  
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118 North Gadsden Street  
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(\*\*) Rand Currier  
Geoff Cookman  
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(\*\*) Andrew O. Isar  
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Vicki Gordon Kaufman