

ORIGINAL



Richard Chapkis
Vice President and General Counsel, Southeast Region
Legal Department

FLTC0717
201 North Franklin Street (33602)
Post Office Box 110
Tampa, Florida 33601-0110

Phone 813 483-1256
Fax 813 273-9825
richard.chapkis@verizon.com

December 8, 2003

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

RECEIVED-FPSC
03 DEC -9 AM 10:32
COMMISSION
CLERK

Re: Docket No. 981834-TP
Petition of Competitive Carriers for Commission Action to Support Local
Competition in BellSouth Telecommunications Inc.'s Service Territory

Docket No. 990321-TP
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

Dear Ms. Bayo:

Please find enclosed an original and one copy of Verizon Florida Inc.'s Notice of
Service of Response to Staff's Twelfth Request for Production of Documents (No.
104) for filing in the above matters. 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.

Sincerely,

Richard A. Chapkis

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC _____
OTH _____
Richard Chapkis
RC:tas
Enclosures

RECEIVED & FILED
th
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12652 DEC-98

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

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: December 8, 2003

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S RESPONSE TO
STAFF'S TWELFTH REQUEST FOR PRODUCTION OF DOCUMENTS
(NO. 104)**

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Response to Staff's Twelfth Request for Production of Documents (No. 104), which was legally propounded by Staff on November 17, 2003, was sent via overnight delivery and electronic mail (ateitzma@psc.state.fl.us) on December 8, 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 December 8, 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.

DOCUMENT NUMBER - DATE

12652 DEC-9 8

FPSC-COMMISSION CLERK

Respectfully submitted on December 8, 2003.

By: Richard A. Chapkis

Richard Chapkis
Verizon Florida Inc.
Post Office Box 110, FLTC0717
Tampa, Florida 33601
Telephone: 813-483-1256

Catherine Ronis
Daniel McCuaig
Jonathan Frankel
Wilmer Cutler & Pickering
2445 M Street N.W.
Washington, DC 20037-1420
Telephone: 202-663-6000

Attorneys for Verizon Florida Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Notice of Service of Response to Staff's Twelfth Request for Production of Documents (No. 104) in Docket Nos. 981834-TP and 990321-TP were sent via U.S. mail on December 8, 2003 to the parties on the attached list.

Richard A. Chapkis

Richard Chapkis

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

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

Rodney L. Joyce
Shook Hardy & Bacon LLP
600 14th St NW, Suite 800
Washington, DC 20005-2004

Virginia C. Tate/Lisa A. Riley
AT&T
1200 Peachtree Street N.E.
Suite 8066
Atlanta, GA 30309-3523

Blue Star Communications Inc.
c/o Robert Waldschmidt
Howell & Fisher
Court Square Building
300 James Robertson Parkway
Nashville, TN 37201-1107

Floyd R. Self
Messer Law Firm
P. O. Box 1876
Tallahassee, FL 32302

Catherine Ronis
Daniel McCuaig
Jonathan Frankel
Wilmer Cutler & Pickering
2445 M Street N.W.
Washington, DC 20037-1420

Anu Seam
U.S. Department of Justice
Telecom Task Force
Antitrust Division
1401 H Street N.W., Suite 8000
Washington, DC 20530

S. Masterton/C. Rehwinkel
Sprint-Florida Incorporated
1313 Blairstone Road
MC FLTLHO0107
Tallahassee, FL 32301

Kenneth Hoffman
Rutledge Law Firm
215 S. Monroe St., Suite 420
Tallahassee, FL 32302

Andrew Isar
Telecomm. Resellers Assn.
c/o Miller Isar, Inc.
7901 Skansie Ave., Suite 240
Gig Harbor, WA 98335

William H. Weber
Covad Communications Co.
1230 Peachtree Street N.E.
19th Floor
Atlanta, GA 30309-3574

Terry Monroe/Genevieve Morelli
CompTel
1900 M Street N.W.
Suite 800
Washington, DC 20036

Michael A. Gross
Florida Cable Telecomm. Assn.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Vicki Kaufman/Joe McGlothlin
McWhirter Law Firm
117 S. Gadsden Street
Tallahassee, FL 32301

David Tobin
Fla. Public Telecomm. Assn.
c/o Tobin & Reyes
7251 W. Palmetto Park Road
#205
Boca Raton, FL 33433-3487

John D. McLaughlin, Jr.
KMC Telecom Inc.
1755 North Brown Road
Lawrenceville, GA 30043-8119

Deborah Eversole
General Counsel
Kentucky Public Service Comm.
P. O. Box 615
Frankfort, KY 40602

Mark E. Buechele
Supra Telecommunications
2620 SW 27th Avenue
Miami, FL 33133

Laura L. Gallagher
MediaOne Florida Tele.
101 E. College Avenue
Suite 302
Tallahassee, FL 32301

Don Sussman
Network Access Solutions Corp.
Three Dulles Tech Center
13650 Dulles Technology Drive
Herndon, VA 20171-4602

Brent McMahan
Network Telephone Corporation
815 South Palafox Street
Pensacola, FL 32501

Matthew Feil
Florida Digital Network Inc.
390 N. Orange Avenue
Suite 2000
Orlando, FL 32801

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