ORIGINAL

MCWHIRTER REEVES

TAMPA OFFICE: 400 NORTH TAMPA STREET, SUITE 2450 TAMPA, FLORIDA 33602 P. O. BOX 3350 TAMPA, FL 33601-3350 (813) 224-0866 (813) 221-1854 FAX PLEASE REPLY TO:

TALLAHASSEE

TALLAHASSEE OFFICE: 117 SOUTH GADSDEN TALLAHASSEE, FLORIDA 32301 (850) 222-2525 (850) 222-2506 FAX

NO DEC 11 PH 4: 35

December 11, 2003

VIA HAND DELIVERY

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

Re: Docket Nos.: 030851-TP

Dear Ms. Bayo:

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MP

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JAM/bae

Enclosures

On behalf of ICG Telecom Group, Inc., (ICG), enclosed for filing and distribution are the original and 1 copy of the following:

 Notice of Service of ICG Telecom Group, Inc.'s Responses to Staff's First Request for Production of Documents (Nos. 1-8) and Answers to Staff's First Set of Interrogatories (Nos. 1-7).

Please acknowledge receipt of the above on the extra copy and return the stamped copies to me. Thank you for your assistance.

RECEIVED & FILED

Sincerely,

Joe McDlothlin

Joseph A. McGlothlin

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MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, KAUFMAN & ARNOLD, P.A.

FPSC-COMMISSION CLE-

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: December 11, 2003

NOTICE OF SERVICE OF ICG TELECOM GROUP, INC.'S RESPONSES TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1 – 8) AND ANSWERS TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1- 7)

ICG Telecom Group, Inc. (ICG), files Notice that it has served its Responses to Staff's First Request for Production of Documents (Nos. 1- 8) and Answers to Staff's First Set of Interrogatories (Nos. 1- 7), by hand delivery and electronic mail to: Adam Teitzman, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399, on this 11th day of December 2003.

seph a. M. Slothlin

Joseph A. McGlothlin McWhirter, Reeves, McGlothlin, Davidson, Kaufman & Arnold, P.A. 117 South Gadsden Street Tallahassee, Florida 32301 (850) 222-2525 (850) 222-5606 (fax) jmcglothlin@mac-law.com

Attorneys for ICG Telecom Group, Inc.

12895 DEC 11 8 PPEC-CC UNESIGN CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Service of ICG Telecom Group, Inc.'s Responses to Staff's First Request for Production of Documents (Nos. 1 - 8) and Answers to Staff's First Set of Interrogatories (Nos. 1 - 7) has been provided by (*) hand delivery, (**)email and U.S. Mail this 11th day of December 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 Verizon Florida, Inc. 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 6th Avenue Tallahassee, Florida 32302

(**) Matthew Feil Florida Digital Network, Inc. 390 North Orange Avenue, Suite 2000 Orlando, Florida 32801

(**) Jeffrey J. Binder Allegiance Telecom, Inc. 1919 M Street, NW 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. Moyle, Flanigan, Katz, Raymond & Sheehan, P.A. The Perkins House 118 North Gadsden Street Tallahassee, FL 32301

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(**) Rand Currier Geoff Cookman Granite Telecommunications, LLC 234 Copeland Street Quincy, MA

(**) Andrew O. Isar Miller Isar, Inc. 2901 Skansie Avenue, Suite 240 Gig Harbor, WA 98335

(**) Scott A. Kassman FDN Communications 390 North Orange Avenue Suite 2000 Orlando, FL 32801

Joseph A. McGlothlin