

ORIGINAL  
MCWHIRTER REEVES  
ATTORNEYS AT LAW

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) 222-3525  
(850) 222-5696 FAX  
RECEIVED - FPSC  
COMMISSION CLERK  
-7 PM 1/7/29

January 7, 2004

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 No.: 030851-TP

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), enclosed for filing and distribution are the original and 1 copy of the following:

- ▶ Notice of Service of DIECA Communications, Inc., d/b/a Covad Communications Company's Responses to Verizon Florida, Inc.'s First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-22) and First Request for Production of Documents (Nos. 1-11).

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

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
WMS \_\_\_\_\_  
SEC \_\_\_\_\_  
OTH \_\_\_\_\_

VGK/bae  
Enclosures

RECEIVED & FILED  
*Man*  
FPSC-BUREAU OF RECORDS

Sincerely,

*Vicki Gordon Kaufman*

Vicki Gordon Kaufman

DOCUMENT NUMBER - DATE  
00249 JAN -7 04  
FPSC-COMMISSION CLERK

**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

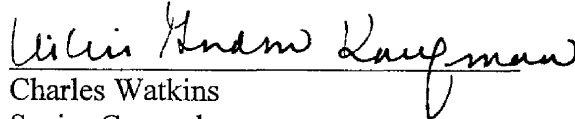
Docket No. 030851-TP

Filed: January 7, 2004

---

**NOTICE OF SERVICE OF DIECA COMMUNICATIONS, INC. D/B/A  
COVAD COMMUNICATIONS COMPANY'S RESPONSES TO  
VERIZON FLORIDA, INC.'S FIRST REQUEST FOR ADMISSIONS (NOS. 1-2),  
FIRST SET OF INTERROGATORIES (NOS. 1-22) AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11)**

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad) files Notice that it has served its Responses to Verizon Florida, Inc.'s First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-22) and First Request for Production of Documents (Nos. 1-11) by e-mail and U.S. Mail to: Richard Chapkis, 201 North Franklin Street, MC: FLTC0717, Tampa, Florida 33602 on this 7th day of January 2004.



Charles Watkins  
Senior Counsel  
Covad Communications Co.  
1230 Peachtree Street, N.E., 19<sup>th</sup> Floor  
Atlanta, Georgia 30309  
(404) 942-3494  
(404) 942-3495 (fax)  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin, Davidson,  
Kaufman & Arnold, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
(850) 222-2525  
(850) 222-5606 (fax)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

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

DOCUMENT NUMBER - DATE

00249 JAN -7 04

FPSC-COMMISSION CLERK

## 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 Responses to Verizon Florida, Inc.'s First Request for Admissions (Nos. 1-2), First Set of Interrogatories (Nos. 1-22) and First Request for Production of Documents (Nos. 1-11) has been provided by (\*) hand delivery, (\*\*) email and U.S. Mail this 7th day of January 2004, to the following:

(\*\*) Jeremy Susac, 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 Monroe 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  
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

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

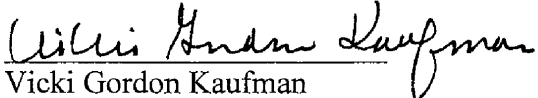
(\*\*) Andrew O. Isar  
Miller Isar, Inc.  
2901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335

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

(\*\*) Thomas M. Koutsky  
Vice president, Law and Policy  
Z-Tel Communications, Inc.  
1200 19<sup>th</sup> Street, NW Suite 500  
Washington, DC 20036

(\*\*) Charles J. Beck  
Deputy Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, Florida 32399-1400

(\*\*) Michael B. Twomey  
Post Office Box 5256  
Tallahassee, Florida 32314-5256

  
Vicki Gordon Kaufman