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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) 222-5606 FAX

January 12, 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.: 981834-TP and 990321-TP

DUCKET NO.: 901034-11 and 990321

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 Response to Verizon Florida, Inc.'s First Request for Production of Documents (No. 1).

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,

Willi Knam Laugman

Vicki Gordon Kaufman

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CAF ____VGK/bae
CMP ____Enclosures
CTR
ECR _____RECEIVED & FILED
GCL
OPC _______MMS
SEC ______FPSC-BUREAU OF RECORDS
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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

In re: 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: January 12, 2004

NOTICE OF SERVICE OF DIECA COMMUNICATIONS, INC. D/B/A COVAD COMMUNICATIONS COMPANY RESPONSE TO VERIZON FLORIDA, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1)

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), files Notice that it has served its Response to Verizon Florida, Inc.'s First Request for Production (No. 1), by Electronic Mail and FedEx to: Richard Chapkis, Verizon Florida, Inc., 201 North Franklin Street, MC FLTC0717, Tampa Florida 33602 and Catherine Ronis/Daniel McCuaig, Wilmer Law Firm, 2445 M. Street, NW, Washington, DC 20037 on this 12th day of January 2004.

DOCUMENT NUMBER-DATE

Charles (Gene) Watkins
Covad Communications Co.
1230 Peachtree Street, N.E., 19th Floor
Atlanta, GA 30309
(404) 942-3494
(404) 942-3495 (fax)
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

Attorneys for Covad Communications Company

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 Response to Verizon Florida, Inc.'s First Request for Production (No. 1) has been furnished by (*) hand delivery, (**) electronic mail, (***) FedEx or U.S. Mail this 12th day of January 2004, to the following:

- (**) Adam Teitzman Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850
- (**) Jeff Wahlen Ausley Law Firm Post Office Box 391 Tallahassee, Florida 32302
- (**) Nancy B. White c/o Nancy H. Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, Florida 32301-1556
- (**) Michael A. GrossFlorida Cable TelecommunicationsAssociation, Inc.246 East 6th Avenue, Suite 100Tallahassee, Florida 32303
- (**) Laura L. Gallagher MediaOne 101 E. College Avenue, Suite 302 Tallahassee, Florida 32301
- (**) Don Sussman Network Access Solutions Corporation Three Dulles Tech Center 13650 Dulles Technology Drive Herndon, VA 20171-4602

- (**) Susan Masterton Charles Rehwinkel Sprint Communications Company Post Office Box 2214 MC: FLTLHO0107 Tallahassee, Florida 32316-2214
- (**) Ann Shelfer Supra Telecommunications 1311 Executive Center Drive, Suite 200 Tallahassee, Florida 32301
- (**) Matthew Feil Florida Digital Network, Inc. 390 North Orange Avenue, Suite 2000 Orlando, Florida 32801
- (**) Robert Waldschmidt Howell & Fisher Court Square Building 300 James Robertson Parkway Nashville, TN 37201
- (**) Richard Heatter Mpower Communications Corp. 175 Sully's Trail, Suite 300 Pittsford, NY 14534
- (**) Rodney Joyce Shook, Hardy & Bacon LLP 600 14th Street, NW Suite 800 Washington, DC 20005

(**)(***) Richard A. Chapkis Verizon Select Services, Inc. Post Office Box 110 FLTC0007 Tampa, Florida 33601-0110

(**)(***) C. Ronis/D. McCuaig/J. Frankel Wilmer Law Firm 2445 M. Street, NW Washington, DC 20037

(**) Tracy Hatch AT&T Communications of the Southern States, Inc. 101 North Monroe Street, Suite 700 Tallahassee, Florida 32301-1549

Vicki Gordon Kaufman