

**ORIGINAL**

**Timolyn Henry**

**From:** Whitt, Chrystal [CC] [Chrystal.Whitt@mail.sprint.com]  
**Sent:** Friday, March 04, 2005 4:50 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** 041144-TP Sprint's 2nd Set of Discovery to KMC  
**Attachments:** 041144-TP Sprints 3-4-05 NOS BB COS.pdf

**Filed on behalf of:**

**Susan S. Masterton**

**Attorney**

**Law/External Affairs  
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**Docket No. 041144-TP**

**Title of filing: Sprint's 2nd Set of Discovery to KMC**

**Filed on behalf of: Sprint**

**No. of pages: 3**

**Description: Sprint's Notice of Service of Sprint's 2nd Set of Interrogatories and POD's to KMC**

- CMP** \_\_\_\_\_
- COM** \_\_\_\_\_
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- ECR** \_\_\_\_\_
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DOCUMENT NUMBER-DATE  
**02287 MAR-4 05**  
FPSC-COMMISSION CLERK

ORIGINAL



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March 4, 2005

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

Re: Docket No. 041144-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint-Florida, Incorporated is Sprint's Notice of Service of Sprint's Second Set of Interrogatories and Second Request for Production of Documents to KMC.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

If you have any questions regarding this electronic filing, please do not hesitate to call me at 850-599-1560.

Sincerely,

A handwritten signature in black ink that reads "Susan S. Masterton".

Susan S. Masterton

Enclosure

DOCUMENT NUMBER-DA

02287 MAR-4

FPSC-COMMISSION CLE

**CERTIFICATE OF SERVICE  
DOCKET NO. 041144-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic and U.S. mail this 4<sup>th</sup> day of March, 2005 to the following:

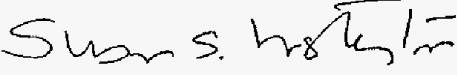
Division of Legal Services  
Lee Fordham/ Dovie Rockette-Gray  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Nancy Pruitt/Ann Marsh  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

KMC Data LLC/KMC Telecom III LLC/KMC Telecom V, Inc.  
Marva B. Johnson/Mike Duke  
1755 North Brown Road  
Lawrenceville, GA 30043-8119

Kelley Drye & Warren LLP  
Chip Yorkgitis  
1200 19th Street, N.W.,  
Fifth Floor  
Washington, DC 20036

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

  
\_\_\_\_\_  
Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of Sprint-Florida, Incorporated	)	Docket No. 041144-TP
Against KMC Telecom III LLC,	)	
KMC Telecom V, Inc. and KMC Data LLC,	)	Filed on: March 4, 2005
for failure to pay intrastate	)	
Access charges pursuant to its interconnection	)	
Agreement and Sprint's tariffs and for violation of	)	
Section 364.16(3)(a), Florida Statutes.	)	

**NOTICE OF SERVICE OF SPRINT'S SECOND SET OF INTERROGATORIES  
AND PRODUCTION OF DOCUMENTS TO KMC TELECOM III LLC, KMC  
TELECOM V, INC. AND KMC DATA LLC**

Sprint-Florida, Incorporated ("Sprint") hereby gives NOTICE that it has propounded its Second Request for Production of Documents and Second Set of Interrogatories to KMC, which are to be answered under oath in full, in accordance with rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.350, Florida Rules of Civil Procedure and served upon the undersigned attorneys for Sprint by Thursday March 24<sup>th</sup>, 2005.

RESPECTFULLY SUBMITTED this 4<sup>th</sup> day of March, 2005 \_\_\_\_\_

*Susan S. Masterton*

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ATTORNEY FOR SPRINT

DOCUMENT NUMBER - DATE  
02287 MAR -4 '05  
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