### ORIGINAL

#### **Timolyn Henry**

From:

Ann Bassett [abassett@lawfla.com]

Sent:

Tuesday, March 29, 2005 4:34 PM

To:

Filings@psc.state.fl.us

Subject:

Docket 040156-TP

Attachments: 2005-03-29, 040156, CCG Notice of Service.pdf

The person responsible for this electronic filing is:

Norman H. Horton, Jr. Messer, Caparello & Self, P.A. P.O. Box 1876 Tallahassee, FL 32302-1876 (850) 222-0720 nhorton@lawfla.com

The Docket No. is 040156-TP - Verizon Petition for Arbitration with certain competitive local exchange carriers

This is being filed on behalf of Allegiance Telecom of Florida, Inc., DIECA Communications, Inc. d/b/a Covad Communications Company, IDT America Corp., KMC Data, Inc., KMC Telecom III, LLC, KMC Telecom V, Inc., NewSouth Communications Corp., The Ultimate Connection, Inc. d/b/a DayStar Communications, Xspedius Management Co. Switched Services, LLC, Xspedius Management Co. of Jacksonville, LLC and XO Florida, Inc. (the "Competitive Carrier Group")

Total Number of Pages is 4

Competitive Carrier Group's Notice of Serving Competitive Carrier Group's Responses to FPSC staff's First Set of Interrogatories and First Request for Production of Documents.

#### Ann Bassett

Messer, Caparello & Self, P.A. Phone: 850-201-5225 abassett@lawfla.com

CMP	
COM	
CTR	
ECR	
GCL	
OPC	
MMS	
RCA_	
SCR_	

03071 MAR 29 %

SEC /

OTH



## Messer, Caparello & Self

A Professional Association

Post Office Box 1876
Tallahassee, Florida 32302-1876
Internet: www.lawfla.com

March 29, 2005

#### BY ELECTRONIC FILING

Ms. Blanca Bayó, Director Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket No. 040156-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Competitive Carriers Group is an electronic version of the Notice of Serving Competitive Carrier Group's Responses to FPSC Staff's First Set of Interrogatories and First Request for Production of Documents in the above referenced docket.

Thank you for your assistance with this filing.

Sincerely yours,

Norman H. Horton, Jr.

NHH/amb Enclosures

cc: Parties of Record



#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for arbitration of amendment to interconnection agreements with certain competitive local exchange carriers and commercial mobile radio service providers in Florida by Verizon Florida Inc.

**DOCKET NO. 040156-TP** 

Filed: March 29, 2005

# NOTICE OF SERVING COMPETITIVE CARRIER GROUP'S RESPONSES TO FPSC STAFF'S FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

DIECA Communications, Inc. d/b/a Covad Communications Company, IDT America Corp., KMC Data LLC, KMC Telecom III LLC, KMC Telecom V, Inc., NuVox Communications, Inc., The Ultimate Connection L.C., XO Florida, Inc., Xspedius Management Co. Switched Services LLC and Xspedius Management Co. of Jacksonville LLC (hereinafter "Competitive Carrier Group"), by and through its undersigned counsel, hereby files and serves Notice that it has served its Responses to FPSC Staff's First Set of Interrogatories and Fir Request for Production of Documents on Lee Fordham, Esq. by e-mail at Ifordham@psc.state.fl.us on this 29<sup>th</sup> day of March, 2005.

Respectfully submitted,

Norman H. Horton, Jr., Esq.

MESSER, CAPARELLO & SELF, P.A. 215 South Monroe Street, Suite 701

Tallahassee, Florida 32301

(850) 222-0720 (voice)

(850) 224-4359 (facsimile)

Brett Freedson Kelley Drye & Warren LLP 1200 19<sup>th</sup> Street, N.W., Fifth Floor Washington, D.C. 20036 (202) 955-9600 (voice) (202) 955-9792 (facsimile)

Counsel to Competitive Carrier Group

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by electronic mail on this 29<sup>th</sup> day of March, 2005.

Lee Fordham, Esq.
Office of General Counsel, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Patricia S. Lee Florida Public Service Commission Division of Competitive Markets & Enforcement 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Richard A. Chapkis, Esq. Verizon Florida Inc. P.O. Box 110, FLTC0717 Tampa, FL 33601-0110

Aaron M. Panner, Esq.
Scott H. Angstreich, Esq.
Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C.
Sumner Square
1615 M Street, N.W., Suite 400
Washington, DC 20036

Eagle Telecommunications, Inc. 5020 Central Avenue St. Petersburg, FL 33707-1942

Mr. Michael E. Britt LecStar Telecom, Inc. 4501 Circle 75 Parkway, Suite D-4200 Atlanta, GA 30339-3025

Donna McNulty, Esq.
MCI
1203 Governors Square Boulevard, Suite 201
Tallahassee, FL 32301-2960

De O'Roark, Esq. MCI 6 Concourse Parkway, Suite 600 Atlanta, GA 30328

Ms. Martine Cadet Myatel Corporation P.O. Box 100106 Ft. Lauderdale, FL 33310-0106 Susan Masterton, Esq.
Sprint Communications Company Limited
Partnership
P.O. Box 2214
Tallahassee, Florida 32316-2214

W. Scott McCollough David Bolduc Stumpf, Craddock Law Firm 1250 Capital of Texas Higway South Building One, Suite 420 Austin, TX 78746

Patrick Wiggins, Esq. Wiggins Law Firm P.O. Drawer 1657 Tallahassee, FL 32302

Michael C. Sloan, Esq. Swidler Berlin 3000 K Street, NW, Suite 300 Washington, DC 20007

Andrew M. Klein, Esq. Kelley Drye & Warren, LLP 1200 Nineteenth Street, NW, Suite 500 Washington, DC 20036

Matthew Feil, Esq. FDN Communications 2301 Lucien Way, Suite 200 Maitland, FL 32751

Genevieve Morelli Brett H. Freedson Kelley Drye & Warren LLP 1200 19<sup>th</sup> St., NW, Suite 500 Washington, D.C. 20036

Floyd R. Self Messer, Caparello & Self, P.A P.O. Box 1876 Tallahassee, FL 32302-1876

Norman H. Horton, Ji