

ORIGINAL



1515 RINGLING BOULEVARD  
SUITE 700  
SARASOTA, FLORIDA 34236  
DISTRIBUTION CENTER  
POST OFFICE BOX 49017  
SARASOTA, FLORIDA 34230-6017  
06 MAY -8 AM 7:30  
(941) 316-7600  
FAX: (941) 316-7903  
TOM.DART@RUDEN.COM

May 3, 2006

VIA FACSIMILE NO. 813-228-6982  
AND REGULAR U.S. MAIL

Richard L. Cox IV  
Senior Account Executive  
Verizon Florida, Inc.  
Verizon Business Partnership Center  
201 N. Franklin St. FLTC0007  
Tampa, FL 33602

RECEIVED-FPSC  
06 MAY -8 AM 9:41  
COMMISSION  
CLERK

Re: Intercoastal Medical Group, Inc. ("IMG")

Dear Mr. Cox:

Please be advised this firm represents Intercoastal Medical Group, Inc. in regard to its account with Verizon Florida, Inc. It is my understanding that you have been the account representative working with IMG, which is the reason for this correspondence to be directed to you. Copies of the same are being provided to the President of Verizon Florida, Inc. and the Public Service Commission.

IMG is a multi-specialty physician practice group maintaining several offices in Sarasota County, Florida. They have been a customer of Verizon for many years maintaining several business accounts for their various offices. Historically, virtually all of the invoices for telephone service for IMG were directed to their corporate offices at 943 S. Beneva Road, Sarasota, Florida 34232. Several months ago, IMG began working with Verizon in order to upgrade their phone service. During the upgrade, Verizon, unilaterally, made several changes that diminished their ability to control their accounts payable functions for the on-going service provided by Verizon. These included the creation of new account numbers for existing phone service accounts, and changing the billing addresses to physical locations to which the telephone numbers were directed, from the corporate offices.

As a result of these changes, certain of the bills for services rendered to one of its offices, 3333 Cattlemen Road, were not picked up by the accounts payable department of IMG. Rather than contacting the principals of IMG with whom Verizon Florida, Inc. had been dealing, or forwarding the same to the traditional billing address at the corporate offices, Verizon elected to disconnect service to the Cattlemen Road address.

CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
ECL \_\_\_\_\_  
DPC \_\_\_\_\_  
ICA \_\_\_\_\_  
ICR \_\_\_\_\_  
GA \_\_\_\_\_  
EC | \_\_\_\_\_  
TH \_\_\_\_\_

SAR:171752:1

DOCUMENT NUMBER-DATE

04025 MAY-8 8

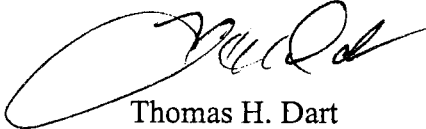
RUDEN, McCLOSKEY, SMITH, SCHUSTER & RUSSELL, P.A.

Richard L. Cox IV  
Senior Account Executive  
Verizon Florida, Inc.  
May 3, 2006  
Page 2

The Cattlemen Road location houses the offices of several of the physicians as well as laboratory facilities for IMG. The disconnection of phone service to those locations resulted in significant damages to IMG and its patients. It has now been learned by IMG that monies that otherwise should have been directed towards the payment of these bills were instead directed to charges by Verizon Directories, Inc., a separate entity, for Yellow Pages advertising of IMG.

We view the conduct by Verizon Florida, Inc. in this matter as tortious as well as in breach of the fiduciary obligation that Verizon Florida, Inc. owes to its customers. The purpose of this communication is to put you on notice of this claim and that IMG intends to pursue this matter, not only for the damages it has incurred, but for whatever regulatory violations have occurred.

Sincerely,



Thomas H. Dart

THD/drw  
cc: Client

Alan F. Cimaporcero, President  
Verizon Florida, Inc.  
201 N. Franklin St.  
Tampa, FL 33602

Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

SAR:171752:1

RUDEN, McCLOSKEY, SMITH, SCHUSTER & RUSSELL, P.A.

CARACAS • FT. LAUDERDALE • MIAMI • NAPLES • ORLANDO • PORT ST. LUCIE • SARASOTA • ST. PETERSBURG • TALLAHASSEE • TAMPA • WEST PALM BEACH