

ORIGINAL

Matilda Sanders

From: McPike, Jessica L [EQ] [Jessica.L.Mcpike@Embarq.com]
Sent: Friday, March 30, 2007 4:29 PM
To: Filings@psc.state.fl.us
Cc: Susan Masterton
Subject: Docket No. 060581 Embarq's Second Request for Production of Documents (No. 2) to Alltel Communications, Inc
Attachments: Ann Cole Second Request for Production 060581-TP 3-30-07.doc

Filed on Behalf of: Susan S. Masterton

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Embarq Florida, Inc.
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Docket No. 060581-TP

Title of filing: *Embarq's Second Request for Production of Documents (No. 2) to Alltel Communications, Inc.*

Filed on behalf of: Susan Masterton

No of pages: 6 pages

Description: *Embarq's Second Request for Production of Documents (No. 2) to Alltel Communications, Inc.*

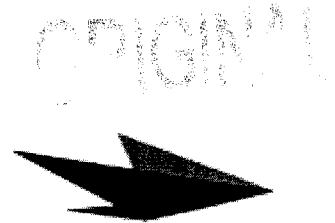
<<Ann Cole Second Request for Production 060581-TP 3-30-07.doc>>

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DOCUMENT NUMBER--DATE

02791 MAR 30 6

FPSC-COMMISSION CLERK



EMBARQ

Embarq Corporation
Mailstop: FLTLHO0102
1313 Blair Stone Rd.
Tallahassee, FL 32301
EMBARQ.com

March 30, 2007

Ms. Ann Cole
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Docket No. 060581-TP, Embarq Florida, Inc.,'s Second Request for Production of Documents (No.2) to Alltel Communications, Inc.

Dear Ms. Cole:

Enclosed for filing on behalf of Embarq Florida, Inc. is Notice of Service of Embarq's Second Request for Production of Documents (No.2) to Alltel Communications, Inc., Docket No. 060581-TP.

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,

s/Susan S. Masterton
Susan S. Masterton

Enclosure

Susan S. Masterton
COUNSEL
LAW AND EXTERNAL AFFAIRS REGULATORY
Voice: (850) 599-1560
Fax: (850) 878-0777

DOCUMENT NUMBER-DATE

02791 MAR 30 5

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 060581-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic and U.S. Mail this 30th of March 2007 to the following.

Beth Keating
Akerman Senterfitt
Highpoint Center, 12th Floor
106 East College Avenue
Tallahassee, FL 32301

Alltel Communications, Inc.
Stephen B. Rowell
One Allied Drive
Little Rock, AR 72202

Florida Public Service Commission
Adam Teitzman, Office of the General Counsel
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Florida Public Service Commission
Robert Casey, Division of Competitive Markets & Enforcement
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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

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

s/Susan S. Masterton
Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of Alltel Communications, Inc. for designation as eligible telecommunications carrier (ETC) in certain rural telephone company study areas located partially in Alltel's licensed area and for redefinition of those study areas.	Docket No. 060581-TP
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**NOTICE OF SERVICE OF EMBARQ FLORIDA, INC.'S SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS (NO. 2) TO ALLTEL
COMMUNICATIONS, INC.**

Embarq Florida, Inc., pursuant to Rule 1.350, Florida Rules of Civil Procedure and Rule 28-106.206, F.A.C., hereby gives notice that it has served its Second Request for Production of Documents (No. 2) on Alltel Communications Inc. via electronic and US mail to Beth Keating, Highpoint Center, 12th Floor, 106 East College Avenue, Tallahassee, FL 32301, which are to be made available for inspection and copying in the offices of Embarq, 1313 Blair Stone Road, Tallahassee, Florida.

RESPECTFULLY SUBMITTED this 30th day of March 2007

s/Susan S. Masterton
SUSAN S. MASTERTON
1313 Blair Stone Road
Tallahassee, FL 32301
(850) 599-1560 (phone)
(850) 878-0777 (fax)
susan.masterton@embarq.com

ATTORNEY FOR EMBARQ

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of Alltel Communications, Inc. for designation as eligible telecommunications carrier (ETC) in certain rural telephone company study areas located partially in Alltel's licensed area and for redefinition of those study areas.	Docket No. 060581-TL
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EMBARQ FLORIDA, INC.'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 2) TO ALLTEL COMMUNICATIONS, INC.

In accordance with Rules 1.280 and 1.350, Florida Rules of Civil Procedure, Embarq Florida, Inc. ("Embarq"), by and through its undersigned counsel, hereby serves its Second Request for Production of Documents (No. 2) to Alltel Communications, Inc. ("Alltel"). Documents must be produced at Embarq's offices at 1313 Blair Stone Road, Tallahassee, Florida 32301 or such other place as counsel may agree.

DEFINITIONS

"Document" shall include, but is not limited to, all correspondence, memoranda, notes, desk calendars, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, invoices, statements, receipts, returns, summaries, pamphlets, books, inter-office and intra-office communications, notations of any sort of conversations, telephone calls, meetings or other communications, bulletins, printed matter, computer printouts, teletypes, telefaxes, work sheets and all drafts, alteration, modifications, changes, and amendments to any of the foregoing and all magnetic recording tapes, computer printouts, computer disks, compact disks (CDs), digital versatile disks (DVDs), databases, tape or other form of electronic data storage, computer software, e-mail, microfilms, files, films, video tapes, photographs, graphic or aural records or representations of any kind and all other writings, whether printed, typewritten, handwritten, recorded or reproduced by any mechanical process.

“You,” “your” or “Alltel” refers to Alltel Communications, Inc. and any of its parent or subsidiary corporations, DBAs, FKAs, and the employees, agents, representatives, or consultants of Alltel Communications, Inc. or its parent or subsidiary corporations.

"Embarq" refers to Embarq Florida, Inc.

INSTRUCTIONS

These Document Requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. If you cannot answer a Document Request in full after exercising due diligence to secure all the information requested, or do not have precise information with regard to any part of an Document Request, you should so state in your response, describing in full your efforts to obtain the information requested, and then proceed to respond to the fullest extent possible. If you object to any part of a Document Request, answer all parts of the Document Request to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

If any response required by way of answer to these Document Requests is considered to contain confidential or protected information, please furnish this information subject to an appropriate protective agreement.

In the event you assert that any information requested herein is privileged, you should identify any such information and any supporting documents in your written response, by date, and provide a general description of its content. You also should identify all persons who participated in the preparation of the document and all persons, inside or outside of

Alltel, who received a copy, read or examined any such document. In addition, you should describe, with particularity, the grounds upon which privilege is claimed.

In the event that you assert that any requested information is not available in the form requested, in your written response thereto, you should disclose the following:

- a. The form in which the requested information currently exists (identifying documents by title or description);
- b. The earliest dates, time period, and location that representatives of Embarq may inspect your files, records or documents in which the information currently exists.

DOCUMENT REQUESTS

2. Please provide copies of all responses provided by you to any Florida Public Service Commission staff data requests related to this docket that were not previously provided in your response to Embarq's POD No. 1.

DATED this 30th day of March 2007.

s/Susan S. Masterton
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ATTORNEY FOR EMBARQ