

**Ruth Nettles**

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**From:** Scobie, Teresa A (TERRY) [terry.scobie@verizon.com]  
**Sent:** Thursday, April 23, 2009 4:00 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Adam Teitzman; Bell, Gloria T; Cecilia Bradley; Charles Beck; David Christian; De O'Roark; Demetria Clark; Elek, Robert (BOB); J. R. Kelly; Kampert, Deborah B (DEBBY); Lee Eng Tan; Michael Twomey  
**Subject:** Docket No. 080278-TL - Verizon Florida LLC's Notice of Service of Objections and Responses to Staff's First Set of Interrogatories, First Request for Production of Documents and First Request for Admissions  
**Attachments:** 080278 VZ FL Notice-Svc-Responses-Staff 1st INTS-POD-RFA.pdf



**The attached is submitted in Docket No. 080278-TL on behalf of Verizon Florida LLC by**

**Dulaney L. O'Roark III**  
**P. O. Box 110, MC FLTC0007**  
**Tampa, Florida 33601**  
**(678) 259-1449**  
**[de.oroark@verizon.com](mailto:de.oroark@verizon.com)**

**The attached document consists of a total of three pages - cover letter (1 page), Notice (1 page) and Certificate of Service (1 page).**

**Terry Scobie**  
**Legal Secretary II**  
**Verizon Legal Department**  
**8800 E. Adamo Drive - MC FLTC0007**  
**Tampa, Florida 33619-3526**  
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DOCUMENT NUMBER-DATE

03806 APR 23 8

FPSC-COMMISSION CLERK

Dulaney L. O'Roark III  
Vice President-General Counsel, Southeast Region  
Legal Department



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Alpharetta, Georgia 30022  
Phone 678-259-1449  
Fax 678-259-1589  
[de.oroark@verizon.com](mailto:de.oroark@verizon.com)

April 23, 2009 – **VIA ELECTRONIC MAIL**

Ann Cole, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 080278-TL  
Joint Petition for show cause proceedings against Verizon Florida LLC for  
apparent violation of Rule 25-4.070, F.A.C., Customer Trouble Reports, and  
impose fines, by the Office of the Attorney General, Citizens of the State of  
Florida, and AARP

Dear Ms. Cole:

Enclosed for filing in the above matter is Verizon Florida LLC's Notice of Service of  
Objections and Responses to Staff's First Request for Production of Documents (Nos.  
1-11), First Set of Interrogatories (Nos. 1-29), and First Request for Admissions (Nos.  
1-2). Service has been made as indicated on the Certificate of Service. If there are  
any questions regarding this filing, please contact me at 678-259-1449.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

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Enclosures

DOCUMENT NUMBER-DATE  
03806 APR 23 8  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Joint Petition for show cause proceedings ) Docket No. 080278-TL  
against Verizon Florida LLC for apparent violation of ) Filed: April 23, 2009  
Rule 25-4.070, F.A.C., Customer Trouble Reports, )  
and impose fines, by the Office of the Attorney )  
General, Citizens of the State of Florida, and AARP )  
\_\_\_\_\_ )

**NOTICE OF SERVICE OF VERIZON FLORIDA LLC'S  
OBJECTIONS AND RESPONSES TO STAFF'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11),  
FIRST SET OF INTERROGATORIES (NOS. 1-29), AND  
FIRST REQUEST FOR ADMISSIONS (NOS. 1-2)**

NOTICE IS HEREBY GIVEN that Verizon Florida LLC, by and through its undersigned counsel, has served its objections and responses to Staff's First Request for Production of Documents (Nos. 1-11), First Set of Interrogatories (Nos. 1-29), and First Request for Admissions (Nos. 1-2) via electronic mail on April 23, 2009 to Lee Eng Tan, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850.

A copy of this Notice was also sent via electronic mail on April 23, 2009 to the Office of the Commission Clerk. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on April 23, 2009.

By: s/ Dulaney L. O'Roark III  
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Fax: (678) 259-1589  
Email: de.oroark@verizon.com

Attorney for Verizon Florida LLC

DOCUMENT NUMBER-DATE

03806 APR 23 8

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail on April 23, 2009 to:

Adam Teitzman, Staff Counsel  
Lee Eng Tan, Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)  
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s/ Dulaney L. O'Roark III