

Dulaney L. O'Roark III
Deputy General Counsel, Southeast
Legal Department

RECEIVED-FPSC

10 AUG 26 AM 9:50

COMMISSION
CLERK ON



5055 North Point Parkway
Alpharetta, Georgia 30022

Phone 678-259-1657
Fax 678-259-5326
de.oroark@verizon.com

August 25, 2010 – **VIA OVERNIGHT MAIL**

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

Re: Docket No. 100340-TP
Investigation of Associated Telecommunications Management Services, LLC
(ATMS) companies for compliance with Chapter 25-24, F.A.C., and applicable
lifeline, eligible telecommunication carrier, and universal service requirements

Dear Ms. Cole:

Please find enclosed Verizon Florida LLC's Objections and Responses to Subpoena
Duces Tecum Without Deposition issued June 30, 2010 in the above-referenced matter.
Verizon considers all of the information in Attachments A and B to be proprietary and
confidential business information and requests that this information be treated
confidentially pursuant to Section 364.183(1), Florida Statutes, and Rule 25-22.006(5),
Florida Administrative Code. The confidential attachments are submitted on the enclosed
CD.

If there are any questions regarding this filing, please contact me at 678-259-1657.

Sincerely,

Dulaney L. O'Roark III
Dulaney L. O'Roark III

CLAIM OF CONFIDENTIALITY
 NOTICE OF INTENT
 REQUEST FOR CONFIDENTIALITY
 FILED BY OPC

FOR DN 07082-10, WHICH
IS IN LOCKED STORAGE. YOU MUST BE
AUTHORIZED TO VIEW THIS DN. - CLK

Enclosures

COM _____
APA _____
ECR _____
GCL I
RAD I
SSC _____
ADM _____
OPC _____
CLK Fona

c: Adam Teitzman (w/e) – via electronic mail
Vicki Gordon Kaufman (w/e) – via electronic mail

DOCUMENT NUMBER-DATE

07081 AUG 26 e

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation of Associated Telecommunications Management Services, LLC (ATMS) companies for compliance with Chapter 25-24, F.A.C., and applicable lifeline, eligible telecommunication carrier, and universal service requirements)	Docket No. 100340-TP
)	Filed: August 26, 2010
)	
)	
)	
)	

**VERIZON FLORIDA LLC'S OBJECTIONS AND RESPONSES TO
SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

Verizon Florida LLC ("Verizon") hereby objects and responds to the Subpoena Duces Tecum Without Deposition ("Subpoena") served by the Florida Public Service Commission Staff as follows:

1. Please provide the following customer information for each customer of the above listed companies¹ in any Verizon state for the months of January 2010 through May 2010:
 - a) Customer Name
 - b) Customer Address
 - c) Customer Telephone Number
 - d) Date of initiation of service
 - e) Date of termination of service
 - f) If the customer was moved to another company, list the company that the customer was moved to
 - g) Type of service or package customer is receiving

RESPONSE: Verizon objects to providing the requested information for customers outside Florida. Verizon further objects to providing the information requested in subparts e) and f) because Verizon does not maintain such information for non-Verizon customers in the normal course of business and it would be unduly burdensome for it to attempt to obtain and compile such information. Subject to these objections, the information requested in subparts a, b, c, d, and g is provided in Confidential Attachment A.

¹ The companies listed in the subpoena were Bellerud Communications, LLC; LifeConnex Telecom, LLC f/k/a Swiftel; Triarch Marketing, Inc.; American Dial Tone f/k/a Ganoco, Inc.; BLC Management, LLC d/b/a Angles Communications Solutions; and All American Telecom, Inc.

2. How many UNE/Wholesale Local Platform (WLP) lines has Ganoco/American Dial Tone purchased from Verizon in the state of Florida from Oct 2008 through April 2009?

RESPONSE: The requested information is provided in Confidential Attachment B.

Respectfully submitted on August 26, 2010.

By: 

Dulaney L. O'Roark III
Post Office Box 110
MC FLTC0007
Tampa, FL 33601-0110
Telephone: 678-259-1657
Facsimile: 678-259-5326

Attorney for Verizon Florida LLC

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

Dulaney L. O'Roark
5055 North Point Parkway
Alpharetta GA 30022

Re: Acknowledgement of Confidential Filing in Docket No. 100340-TP.

This will acknowledge receipt by the Florida Public Service Commission, Office of Commission Clerk, of a CONFIDENTIAL DOCUMENT filed on August 26, 2010, in the above-referenced docket.

Document Number 07082-10 has been assigned to this filing, which will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.