

Diamond Williams

From: Bryson, Arlene [Arlene.Bryson@ruden.com] on behalf of Cooke, Michael [Michael.Cooke@ruden.com]
Sent: Tuesday, October 25, 2011 3:26 PM
To: Filings@psc.state.fl.us
Cc: Adam L. Scherr; Alan Gold; Allen Zorachi, Esq.; Andrew M. Klein, Esq.; Dulaney O'Roarke, Esq.; Eric Branfman; Jane Whang; Jason Topp; John Greive; Margie Herlth; Marsha E. Rule, Esq.; Matthew Feil; Michael McAlister; Philip Macres; Richard Brown; john.messenger@paetec.com; Lee Eng Tan
Subject: Docket No. 090538-TP- Qwest Communications Company, LLC - Notice of Service of First Set of Interrogatories and Document Requests - Flatel

Attachments: 3526_001.pdf

Docket No.:

Docket No. 090538-TP – Amended Complaint of Qwest Communications Company, LLC against MCImetro Access Transmission Services (d/b/a Verizon Access Transmission Services); XO Communications Services, Inc.; tw telecom of florida, l.p.; Granite Telecommunications, LLC; Broadwing Communications, LLC; Access Point, Inc.; Birch Communications, Inc.; Budget Prepay, Inc.; Bullseye Telecom, Inc.; DeltaCom, Inc.; Ernest Communications, Inc.; Flatel, Inc.; Lightyear Network Solutions, LLC; Navigator Telecommunications, LLC; PaeTec Communications, Inc.; STS Telecom, LLC; US LEC of Florida, LLC; Windstream Nuvox, Inc.; and John Does 1 through 50, for unlawful discrimination.

Person Filing:

Michael G. Cooke
Ruden McClosky P.A.
215 S. Monroe Street, Suite 815
Tallahassee, FL 32301
(850) 412-2005
(850) 412-1305 facsimile
Michael.Cooke@Ruden.com

Filed on behalf of:

Qwest Communications Company, LLC

Total number of pages:

Five (5)

Description:

Qwest Communication Company, LLC's Notice of Service of First Set of Interrogatories and Document Requests - Flatel

Arlene Bryson
Legal Secretary



401 East Jackson Street
Suite 2700
Tampa, FL 33602
Direct 813-222-6877 | Fax 813-314-6977
Arlene.Bryson@ruden.com | www.ruden.com

[To subscribe to our advisories, please click here.](#)

DOCUMENT NUMBER-DATE

07839 OCT 25 =

10/25/2011

FPSC-COMMISSION CLERK

NOTICE: This e-mail message and any attachment to this e-mail message contains confidential information that may be legally privileged. If you are not the intended recipient, you must not review, retransmit, convert to hard copy, copy, use or disseminate this e-mail or any attachments to it. If you have received this e-mail in error, please notify us immediately by return e-mail or by telephone at 954-764-6660 and delete this message. Please note that if this e-mail message contains a forwarded message or is a reply to a prior message, some or all of the contents of this message or any attachments may not have been produced by the sender.

10/25/2011



401 EAST JACKSON STREET
SUITE 2700
TAMPA, FLORIDA 33602

(813) 222-6685
FAX: (813) 314-6985
MICHAEL.COOKE@RUDEN.COM

October 25, 2011

Ms. Ann Cole, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 090538-TP, Qwest Communication Company, LLC's Notice of Service of First Set of Interrogatories and Document Requests to Flatel

Dear Ms. Cole:

Enclosed for filing in the above-referenced docket is Qwest Communication Company, LLC's Notice of Service of First Set of Interrogatories and Document Requests to Flatel.

Thank you for your assistance with this filing and please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael G. Cooke".

Michael G. Cooke

MGC:amb
Enclosure

RM:8147805:1

BOCA RATON • FT. LAUDERDALE • MIAMI • NAPLES • ORLANDO • PORT ST. LUCIE • TALLAHASSEE • TAMPA • WEST PALM BEACH

DOCUMENT NUMBER-DATE

07839 OCT 25 =

FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF FLORIDA

Amended Complaint of QWEST
COMMUNICATIONS COMPANY, LLC, Against
MCIMETRO ACCESS TRANSMISSION
SERVICES, LLC (D/B/A VERIZON ACCESS
TRANSMISSION SERVICES), XO
COMMUNICATIONS SERVICES, INC., TW Docket No. 090538-TP
TELECOM OF FLORIDA, L.P., GRANITE
TELECOMMUNICATIONS, LLC,
BROADWING COMMUNICATIONS, LLC,
ACCESS POINT, INC., BIRCH
COMMUNICATIONS, INC., BUDGET PREPAY, Filed: October 25, 2011
INC., BULLSEYE TELECOM, INC.,
DELTACOM, INC., ERNEST
COMMUNICATIONS, INC., FLATEL, INC.,
LIGHTYEAR NETWORK SOLUTIONS, LLC,
NAVIGATOR TELECOMMUNICATIONS, LLC,
PAETEC COMMUNICATIONS, INC., STS
TELECOM, LLC, US LEC OF FLORIDA, LLC,
WINDSTREAM NUVOX, INC., AND JOHN
DOES 1 THROUGH 50, For unlawful
discrimination.

**NOTICE OF SERVICE OF FIRST SET OF INTERROGATORIES (1-7)
AND DOCUMENT REQUESTS (1-4)
TO FLATEL**

Qwest Communications Company, LLC, d/b/a CenturyLink QCC ("QCC") hereby files and serves Notice that on October 21, 2011, it served its first Set of Interrogatories and Document Requests to Flatel, Inc., upon the persons and in the manner indicated on the certificate of service below.

Respectfully submitted this 25th day of October, 2011.

By: s/ Michael G. Cooke

Michael G. Cooke

(Fla. Bar No. 0979457)

Ruden McClosky

401 E. Jackson St., Suite 2700

Tampa, FL 33606

Telephone: (813) 222-6685

Facsimile: (813) 314-6985

michael.cooke@ruden.com

Adam L. Sherr (not admitted in Florida)

Associate General Counsel

Qwest

1600 7th Avenue, Room 1506

Seattle, WA 98191

Tel: 206-398-2507

Fax: 206-343-4040

Email: Adam.Sherr@qwest.com

Attorneys for Qwest Communications

Company, LLC fka Qwest Communications

Corporation

CERTIFICATE OF SERVICE

DOCKET NO. 090538-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic delivery and/or U.S. Mail this 25th day of October, 2011, to the following:

Florida Public Service Commission
Theresa Tan
Florida Public Service Commission
Office of General Counsel
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
ltan@psc.state.fl.us

tw telecom of florida, l.p.
XO Communications Services, Inc.
Windstream NuVox, Inc.
Birch Communications, Inc.
DeltaCom, Inc.
Matthew J. Feil
Gunster Yoakley & Stewart, P.A.
215 S. Monroe Street, Suite 618
Tallahassee, FL 32301
mfeil@gunster.com

Qwest Communications Co., LLC.
Jason D. Topp, Corporate Counsel
Qwest Communications Co., LLC
200 S. Fifth Street, Room 2200
Minneapolis, MN 55402
Jason.topp@qwest.com

Broadwing Communications, LLC
Marsha E. Rule
Rutledge, Ecenia & Purnell
P.O. Box 551
Tallahassee, FL 32302-0551
marsha@reuphlaw.com

MCImetro Access Transmission Service
d/b/a VerizonAccess Transmission Services
Dulaney O'Roark
VerizonAccess Transmission Services
Six Concourse Pkwy, NE, Ste 800
Atlanta, GA 30328
De.oroark@verizon.com

XO Communications Services, Inc.
Jane Whang
Davis Wright Tremain
Suite 800
505 Montgomery Street
San Francisco, California 94111-6533
JaneWhang@dwt.com

Granite Communications, LLC
BullsEye Telecom, Inc.
Andrew M. Klein
Allen C. Zoraki
Klein Law Group, PLLC
1250 Connecticut Avenue, NW
Suite 200
Washington, D.C. 20036
aklein@kleinlawpllc.com
azoracki@kleinlawpllc.com

STS Telecom, LLC
Alan C. Gold
1501 Sunset Drive
2nd Floor
Coral Gables, FL 33143
agold@acgoldlaw.com

Qwest Communications Co., LLC
Adam Sherr
Associate General Counsel
Qwest Communications Co., LLC
1600 7th Avenue, Room 1506
Seattle, WA 98191
adam.sherr@qwest.com

Navigator Telecommunications, LLC
Michael McAlister, General Counsel
Navigator Telecommunications, LLC
8525 Riverwood Park Drive
P. O. Box 13860
North Little Rock, AR 72113
mike@navtel.com

CERTIFICATE OF SERVICE
DOCKET NO. 090538-TP
Page 2

Access Point, Inc.
Lightyear Network Solutions, LLC Navigator
Telecommunications, LLC PAETEC
Communications, Inc.
US LEC of Florida, LLC d/b/a PAETEC
Business Services
Eric J. Branfman
Philip J. Macres
Bingham McCutchen, LLP
2020 K Street NW
Washington, DC 20006-1806
eric.branfman@bingham.com
Philip.macres@bingham.com

Access Point, Inc.
Richard Brown
Chairman-Chief Executive Officer
Access Point, Inc.
1100 Crescent Green, Suite 109
Cary, NC 27518-8105
Richard.brown@accesspointinc.com

Flatel, Inc.
c/o Adriana Solar
2300 Palm Beach Lakes Blvd.
Executive Center, Suite 100
West Palm Beach, Florida 33409

Budget Prepay, Inc.
c/o NRAI Services, Inc.
2731 Executive Park Drive, Suite 4
Weston, Florida 33331
and
Budget Prepay, Inc.
General Counsel
1325 Barksdale Blvd., Suite 200
Bossier City, LA 71111

Lightyear Network Solutions, Inc.
John Greive, Vice President of Regulatory
Affairs & General Counsel
Lightyear Network Solutions, LLC
1901 Eastpoint Parkway
Louisville, KY 40223
john.greive@lightyear.net

PAETEC Communications, Inc. and
US LEC of Florida, LLC d/b/a PAETEC
Business Services
John B. Messenger, Vice President and
Associate General Counsel
PAETEC Communications, Inc.
One PaeTec Plaza
600 Willowbrook Office Park
Fairpoint, NY 14450
john.messenger@paetec.com

Ernest Communications, Inc.
General Counsel
5275 Triangle Parkway
Suite 150
Norcross, GA 30092

s/ Michael G. Cooke
Michael G. Cooke