

**Diamond Williams**

---

**From:** Bryson, Arlene [Arlene.Bryson@ruden.com] on behalf of Cooke, Michael [Michael.Cooke@ruden.com]  
**Sent:** Tuesday, October 25, 2011 3:27 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 - Granite  
**Attachments:** 3527\_001.pdf

**Docket No.:**

Docket No. 090538-TP – Amended Complaint of Qwest Communications Company, LLC against MCI/metro 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](mailto: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 - Granite

---

**Arlene Bryson**  
 Legal Secretary



401 East Jackson Street  
 Suite 2700  
 Tampa, FL 33602  
 Direct 813-222-6677 | Fax 813-314-6977  
[Arlene.Bryson@ruden.com](mailto:Arlene.Bryson@ruden.com) | [www.ruden.com](http://www.ruden.com)

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

DOCUMENT NUMBER-DATE

07840 OCT 25 =

FPSC-COMMISSION CLERK

10/25/2011

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 Granite

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 Granite.

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

Sincerely,

Michael G. Cooke

MGC:amb  
Enclosure

RM:8147808:1

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 (1-8)  
AND DOCUMENT REQUESTS (1-5)  
TO GRANITE**

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 Granite Telecommunications, LLC, upon the persons and in the manner indicated on the certificate of service below.

Respectfully submitted this 25<sup>th</sup> 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 25<sup>th</sup> 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 7<sup>th</sup> 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

*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

*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

*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

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

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

*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

s/ Michael G. Cooke  
Michael G. Cooke