

Diamond Williams

From: Allen Zoracki [azoracki@kleinlawpllc.com]
Sent: Friday, December 02, 2011 4:45 PM
To: Filings@psc.state.fl.us
Cc: Lee Eng Tan; adam.sherr@qwest.com; michael.cooke@ruden.com; 'Feil, Matthew'; 'Marsha Rule'; 'O'Roark, Dulaney L'; 'Whang, Jane'; agold@acgoldlaw.com; mike@navtel.com; 'Branfman, Eric J.'; 'Macres, Philip J.'; john.greive@lightyear.net; richard.brown@accesspoint.com; 'Messenger, John'; asolar@flatel.net; flatel@aol.com; lhaag@earnestgroup.com; 'Andrew Klein'
Subject: Docket No. 090538-TP - BullsEye Telecom, Inc.'s Notice of Serving Objections and Responses to Qwest Discovery Requests

Attachments: Dkt 090538-TP - NOTICE of Srvg Resp - BullsEye.pdf

Attached for electronic filing in the above-referenced docket, please find *BullsEye Telecom, Inc.'s Notice of Serving Objections and Responses to Qwest Communications Company, LLC's First Set of Interrogatories (Nos. 1-8) and Document Requests (Nos. 1-5)*. This filing is being re-sent, as an earlier attempt to electronically file this document was returned as "undeliverable."

If you have any questions, please do not hesitate to contact us.

a. Persons responsible for filing:

Andrew M. Klein
 Allen C. Zoracki
 KLEIN LAW GROUP PLLC
 1250 Connecticut Ave. NW
 Suite 200
 Washington, DC 20036
 Phone: (202) 289-6955
 AKlein@KleinLawPLLC.com
 AZoracki@KleinLawPLLC.com

b. Docket No.: 090538-TP – Amended Complaint of Qwest Communications Company, LLC against MCImetro Access, et al.

c. Filed on behalf of: BullsEye Telecom, Inc.

d. Total pages: 3

e. Brief Description: BullsEye Telecom, Inc.'s Notice of Serving Objections and Responses to Qwest Communications Company, LLC's First Set of Interrogatories (Nos. 1-8) and Document Requests (Nos. 1-5)

Respectfully submitted,

Allen C. Zoracki
 KLEIN LAW GROUP PLLC
 Direct: (518) 336-4300
 General: (202) 289-6955

*Admitted in New York

12/2/2011

DOCUMENT NUMBER DATE

08759 DEC-2 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Amended Complaint of Qwest Communications }
Company, LLC against MCImetro Access Transmission } Docket No. 090538-TP
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. }

**BULLSEYE TELECOM, INC.'S NOTICE OF SERVING OBJECTIONS AND
RESPONSES TO QWEST COMMUNICATIONS COMPANY, LLC'S FIRST SET
OF INTERROGATORIES (NOS. 1-8) AND DOCUMENT REQUESTS (NOS. 1-5)**

BULLSEYE TELECOM, INC. (“BullsEye”, or “the Company”), by and through its undersigned counsel, hereby gives notice that the Company has served its objections and responses to Qwest Communications Company, LLC’s First Set of Interrogatories (Nos. 1-8) and Document Requests (Nos 1-5) upon the parties and in the manner indicated on the attached certificate of service.

This notice is respectfully submitted by electronic mail the 2nd day of December, 2011.

/s Andrew M. Klein

Andrew M. Klein*
Allen C. Zoracki*
KLEIN LAW GROUP PLLC
1250 Connecticut Ave. NW, Suite 200
Washington, DC 20036
Phone: (202) 289-6955
Fax: (202) 289-6997
Email: AKlein@KleinLawpllc.com
*Counsel for Respondent
BullsEye Telecom, Inc.*

* Designated as a qualified representative in Docket No. 100008-OT

DOCUMENT NUMBER DATE

08759 DEC-2 =

FPSC-COMMISSION CLERK

**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 2nd day of December, 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

Qwest Communications Company, LLC
Adam L. Sherr
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

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

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

Qwest Communications Company, LLC
Michael G. Cooke
Ruden McClosky
401 E. Jackson St., Suite 2700
Tampa, FL 33606
Telephone: (813) 222-6685
Facsimile: (813) 314-6985
michael.cooke@ruden.com

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

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

Granite Telecommunications, LLC
Andrew M. Klein
Allen C. Zoracki
Klein Law Group, PLLC
1250 Connecticut Avenue, NW, Suite 200
Washington, D.C. 20036
aklein@kleinlawpllc.com
azoracki@kleinlawpllc.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

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
lhaag@earnestgroup.com

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

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
asolar@flatel.net
flatel@aol.com

Budget Prepay, Inc.
c/o NRAI Services, Inc.
2731 Executive Park Drive, Suite 4
Weston, Florida 33331

/s/ Allen C. Zoracki
Allen C. Zoracki