

Dorothy Menasco

From: Allen Zoracki [azoracki@kleinlawpllc.com]
Sent: Friday, December 16, 2011 3:52 PM
To: Filings@psc.state.fl.us
Cc: Lee Eng Tan; adam.sherr@qwest.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; asolar@flatel.net; flatel@aol.com; lhaag@ernestgroup.com; 'Andrew Klein'; susan.masterson@centurylink.com
Subject: Docket No. 090538-TP - Granite Telecommunications, LLC Notice of Serving Objections and Responses to Staff Discovery Requests
Attachments: Dkt 090538-TP - NOTICE of Srvg Resp Staff 1st Discovery - Granite.pdf

Attached for electronic filing in the above-referenced docket, please find *Granite Telecommunications, LLC's Notice of Serving Objections and Responses to Staff's First Set of Interrogatories (Nos. 1-10) and First Set of Document Requests (No. 1)*. 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: Granite Telecommunications, LLC

d. Total pages: 3

e. Brief Description: Granite Telecommunications, LLC's Notice of Serving Objections and Responses to Staff's First Set of Interrogatories (Nos. 1-10) and First Set of Document Requests (No. 1)

Respectfully submitted,

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

*Admitted in New York

DOCUMENT NUMBER DATE

09022 DEC 16 =

12/19/2011

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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.

Docket No. 090538-TP

GRANITE TELECOMMUNICATIONS, LLC'S NOTICE OF SERVING OBJECTIONS AND RESPONSES TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-10) AND FIRST SET OF DOCUMENT REQUESTS (NO. 1)

GRANITE TELECOMMUNICATIONS, LLC ("Granite", or "the Company"), by and through its undersigned counsel, hereby gives notice that the Company has served its objections and responses to Staff's First Set of Interrogatories to Granite Telecommunications, LLC (Nos. 1-10) and First Set of Document Requests to Granite Telecommunications, LLC (No. 1) upon the parties and in the manner indicated on the attached certificate of service.

This notice is respectfully submitted by electronic mail the 16th 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
AKlein@KleinLawpllc.com
AZoracki@KleinLawpllc.com
Counsel for Respondent
Granite Telecommunications, LLC

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

DOCUMENT NUMBER DATE
09022 DEC 16 =

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 16th 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.
STS Telecom, LLC
Matthew J. Feil
Gunster Yoakley & Stewart, P.A.
215 S. Monroe Street, Suite 618
Tallahassee, FL 32301
mfeil@gunster.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

Qwest Communications Company, LLC
d/b/a CenturyLink QCC
Susan S. Masterson
CenturyLink
315 S. Calhoun St., Suite 500
Tallahassee, FL 32301
Tel: 850-599-1560
Fax: 850-224-0794
susan.masterson@centurylink.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 Tremaine
Suite 800
505 Montgomery Street
San Francisco, California 94111-6533
JaneWhang@dwt.com

BullsEye Telecom, Inc.
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

Ernest Communications, Inc.
General Counsel
5275 Triangle Parkway
Suite 150
Norcross, GA 30092
lhaag@ernestgroup.com

Budget Prepay, Inc.
Alan C. Gold
Alan C. Gold, P.A.
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

/s/ Allen C. Zoracki
Allen C. Zoracki