

**Eric Fryson**

**From:** Cooper, Roberta G [Roberta.G.Cooper@CenturyLink.com]  
**Sent:** Monday, January 30, 2012 1:42 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Masterton, Susan S; Sherr, Adam  
**Subject:** 090538 Notice of Service-Birch Inc  
**Attachments:** 090538 QCC Notice of Service Birch 1st Set of Discovery 1-30-12.pdf

Filed on Behalf of: Susan S. Masterton  
 Senior Corporate Counsel  
 CenturyLink QCC  
 315 S. Calhoun Street, Suite 500  
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Docket No. 090538

Title of filing: CenturyLink QCC's Notice of Service of Objections and Responses to Birch Communication Inc.'s First Set of Interrogatories (Nos. 1-4) and First Request for Production of Documents (Nos. 1-3).

Filed on behalf of: CenturyLink QCC

No of pages: 4

Description: CenturyLink QCC's Notice of Service of Objections and Responses to Birch Communication Inc.'s First Set of Interrogatories (Nos. 1-4) and First Request for Production of Documents (Nos. 1-3).

**Roberta Cooper**

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DOCUMENT NUMBER-DATE

00595 JAN 30 2012

FPSC-COMMISSION CLERK

1/30/2012



January 30, 2012

**VIA ELECTRONIC FILING**

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

**Re: Docket No. 090538-TP - 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 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**

Dear Ms. Cole:

Enclosed for filing in the above-referenced docket please find Qwest Communications Company, LLC, d/b/a CenturyLink QCC's Notice of Service of Objections and Responses to Birch Communication Inc.'s First Set of Interrogatories (Nos. 1-4) and First Request for Production of Documents (Nos. 1-3).

Copies are being served upon the parties in this docket pursuant to the attached certificate of service.

Sincerely,

/s/ Susan S. Masterton  
Susan S. Masterton

Enclosures

Susan S. Masterton  
Senior Corporate Counsel  
315 S. Calhoun Street, Suite 500  
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090538-TP  
JAN 30 2012  
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**CERTIFICATE OF SERVICE  
DOCKET NO. 090538-TP**

I hereby certify that a true and correct copy of the foregoing has been served upon the following by electronic mail delivery and/or U.S. Mail this 30<sup>th</sup> day of January, 2012.

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| <p>Florida Public Service Commission<br/>Theresa Tan<br/>Office of General Counsel<br/>2540 Shumard Oak Blvd.<br/>Tallahassee, FL 32399-0850<br/><a href="mailto:ltan@psc.state.fl.us">ltan@psc.state.fl.us</a></p> | <p>Bingham Law Firm<br/>Eric J. Branfman/Philip J. Macres<br/>2020 K Street, N.W.<br/>Washington, DC 20006<br/><a href="mailto:eric.branfman@bingham.com">eric.branfman@bingham.com</a><br/><a href="mailto:philip.macres@bingham.com">philip.macres@bingham.com</a></p>           |
| <p>Birch Communications, Inc.<br/>Chris Bunce<br/>2300 Main Street, Suite 600<br/>Kansas City, MO 64108-2415<br/><a href="mailto:chris.bunce@birch.com">chris.bunce@birch.com</a></p>                               | <p>Broadwing Communications, LLC<br/>Greg Diamond<br/>c/o Level 3 Communications<br/>1025 Eldorado Blvd.<br/>Broomfield, CO 80021-8869<br/><a href="mailto:Greg.Diamond@level3.com">Greg.Diamond@level3.com</a></p>  |
| <p>Budget PrePay, Inc.<br/>1325 Barksdale Blvd., Suite 200<br/>Bossier City, LA 71111-4600</p>  | <p>BullsEye Telecom, Inc.<br/>David Bailey<br/>25925 Telegraph Road, Suite 210<br/>Southfield, MI 48033-2527<br/><a href="mailto:dbailey@bullseyetelecom.com">dbailey@bullseyetelecom.com</a></p>  |
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| <p>Ernest Communications, Inc.<br/>5275 Triangle Parkway, Suite 150<br/>Norcross, GA 30092-6511</p>   | <p>Flatel, Inc.<br/>Executive Center, Suite 100<br/>2300 Palm Beach Lakes Blvd.<br/>West Palm Beach, FL 33409-3307</p>   |
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| <p>Qwest Communications Company, LLC<br/> Adam L. Sherr<br/> 1600 7th Avenue, Room 1506<br/> Seattle, WA 98191<br/> <a href="mailto:Adam.Sherr@qwest.com">Adam.Sherr@qwest.com</a></p>   | <p>Rutledge Law Firm<br/> Marsha E. Rule<br/> P.O. Box 551<br/> Tallahassee, FL 32302-0551<br/> <a href="mailto:marsha@reuphlaw.com">marsha@reuphlaw.com</a></p>   |
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| <p>Division of Regulatory Analysis<br/> Brenda Merritt<br/> Florida Public Service Commission<br/> 2540 Shumard Oak Boulevard<br/> Tallahassee, FL 32399<br/> <a href="mailto:bmerritt@psc.state.fl.us">bmerritt@psc.state.fl.us</a></p> | <p>Verizon Access Transmission Services<br/> David Christian<br/> 106 East College Avenue, Suite 710<br/> Tallahassee, FL 32301-7721<br/> <a href="mailto:david.christian@verizon.com">david.christian@verizon.com</a></p> |
| <p>Verizon Florida LLC<br/> Dulaney L. O'Roark III<br/> 5055 North Point Parkway<br/> Atlanta, GA 30328<br/> <a href="mailto:de.oroark@verizon.com">de.oroark@verizon.com</a></p>  | <p>Windstream NuVox, Inc.<br/> Ed Krachmer<br/> 4001 Rodney Parham Road<br/> MS: 1170-BIFO3-53A<br/> Little Rock, AR 7221 2<br/> <a href="mailto:Edward.Krachmer@windstream.com">Edward.Krachmer@windstream.com</a></p>    |
| <p>XO Communications Services, Inc.<br/> Mr. John Ivanuska<br/> 10940 Parallel Parkway, Suite K - #353<br/> Kansas City, KS 66109-4515<br/> <a href="mailto:john.ivanuska@xo.com">john.ivanuska@xo.com</a></p>                           | <p>Windstream NuVox Inc.<br/> James White<br/> 5220 Belford Road, Suite 115<br/> Jacksonville, FL 32256-6029<br/> <a href="mailto:bettye.j.willis@windstream.com">bettye.j.willis@windstream.com</a></p>                   |

/s/ Susan S. Masterton  
Susan S. Masterton

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: 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

DATED: January 30, 2012

**QWEST COMMUNICATIONS COMPANY, LLC'S NOTICE OF SERVICE**

Qwest Communications Company, LLC, d/b/a CenturyLink QCC ("QCC"), serves notice that, by and through its undersigned counsel, it has served its Objections and Responses to Birch Communication Inc.'s First Set of Interrogatories (Nos. 1-4) and First Request for Production of Documents (Nos. 1-3) by U.S. Mail to Matthew J. Feil, 215 South Monroe Street, Suite 601, Tallahassee, FL 32301 and electronically at [mfeil@gunster.com](mailto:mfeil@gunster.com) on this 30<sup>th</sup> day of January, 2012.

/s/ Susan S. Masterton  
Susan S. Masterton  
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ATTORNEYS FOR QWEST COMMUNICATIONS COMPANY, LLC D/B/A CENTURYLINK QCC

DOCUMENT NUMBER-DATE

00595 JAN 30 2012

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