

Eric Fryson

From: Galloway, Cecilia (Cissy) [CGalloway@gunster.com]
Sent: Tuesday, May 01, 2012 4:13 PM
To: Filings@psc.state.fl.us
Cc: Lee Eng Tan; 'aklein@kleinlawpllc.com'; 'de.oroark@verizon.com'; 'janewhang@dwt.com'; 'Chris.bunce@birch.com'; 'Edward.Krachmer@windstream.com'; 'Eric.branfman@bingham.com'; 'rcurrier@granitenet.com'; Feil, Matthew; 'Carolyn.Ridley@twtelecom.com'; 'kris.shulman@xo.com'; 'marsha@reuphlaw.com'; 'Richard.brown@accesspointinc.com'; 'John.greive@lightyear.net'; 'mike@navtel.com'; 'John.messenger@paetec.com'; 'Philip.macres@bingham.com'; 'Greg.diamond@level3.com'; 'dbailey@bullseyetelecom.com'; 'azoracki@kleinlawpllc.com'; 'bettye.j.willis@windstream.com'; 'agold@acgoldlaw.com'; 'Susan.Masterton@CenturyLink.com'; 'Sherr, Adam'; 'pfoley@corp.earthlink.com'; 'rebecca.edmonston@verizon.com'; 'gene@penningtonlaw.com'; 'lhaag@ernestgroup.com'; 'asolar@flatel.net'; Laura King; 'david@budgetprepay.com'
Subject: RE: PSC Filing Docket No. 090538-TP - DeltaCom Notice of Serving 1st Set of Int & PODs to Qwest
Attachments: DeltaCom First Int to Qwest - PSC NOTICE 5-01.pdf

The attached is an electronic filing for the docket referenced below. If you have any questions, please contact Matt Feil at the number below. Thank you.

Person Responsible for Filing:

Matthew Feil
 Gunster Law Firm
 215 South Monroe Street, Suite 601
 Tallahassee, FL 32301
 Direct: 850-521-1708
 Main: 850-521-1980
mfeil@gunster.com

Docket Name and Number: 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.

Filed on Behalf of: DeltaCom, Inc.

Total Number of Pages: 4

Description of Documents: DeltaCom, Inc.'s Notice of Serving Its 1st Set of Interrogatories and 1st Set of Document Requests to Qwest

DOCUMENT NUMBER: DATE

02760 MAY-1 2012

FPSC-COMMISSION CLERK

5/1/2012



GUNSTER

FLORIDA'S LAW FIRM FOR BUSINESS

Cecilia C. Galloway
Governmental Affairs
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Tallahassee, FL 32301
Main 850-521-1980 Direct 850-521-1726

Tax Advice Disclosure: To ensure compliance with requirements imposed by the IRS under Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments), unless otherwise specifically stated, was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any matters addressed herein. Click the following hyperlink to view the complete Gunster IRS Disclosure & Confidentiality note.

<http://www.gunster.com/terms-of-use/>



Writer's Direct Dial Number: 850-521-1708
Writer's E-Mail Address: MFeil@gunster.com

May 1, 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 (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 is DeltaCom, Inc.'s Notice of Serving its First Set of Interrogatories (No. 1) and First Set of Document Requests (No. 1) to Qwest Communications Company, LLC., in the above referenced docket submitted by electronic mail.

Thank you for your assistance in this matter.

Sincerely,

Matthew J. Feil

MJF/ccg

Enclosures

DOCUMENT NUMBER - DATE
02760 MAY-1 2012

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.;	}	Docket No. 090538-TP
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.;	}	Filed: May 1, 2012
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.	}	

DELTACOM, INC.'S NOTICE OF SERVING FIRST SET OF INTERROGATORIES (NOS. 1) AND FIRST SET OF DOCUMENT REQUESTS (NO. 1) TO QWEST COMMUNICATIONS COMPANY, LLC

DELTACOM, INC.'S ("DeltaCom", or "the Company"), by and through its undersigned counsel, hereby gives notice that the Company has served its First Set of Interrogatories (No. 1) and First Set of Document Requests (No. 1) to Qwest Communications Company, LLC by electronic mail and/or U.S. Mail to Ms. Susan Masterton of CenturyLink, QCC and Mr. Adam Sherr of Qwest Communications, Company, LLC. Copies of same have been provided to parties consistent with the attached Certificate of Service.

This notice is respectfully submitted by electronic mail the 1st day of May, 2012.



Matthew J. Feil
 Gunster, Yoakley & Stewart, P.A.
 215 S. Monroe Street, Suite 601
 Tallahassee, Florida 32301
 Telephone: (850) 521-1980
 Facsimile: (850) 576-0902

DOCUMENT NUMBER-DATE

02760 MAY-1 2012

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by email, and/or U.S. Mail this 1st day of May, 2012.

Lee Eng Tan Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 ltan@psc.state.fl.us	Eric J. Branfman/Philip J. Macres Bingham Law Firm 2020 K Street, NW Washington, DC 20006 eric.branfman@bingham.com Philip.macres@bingham.com
Mr. Chris Bunce Birch Communications, Inc. 2300 Main Street, Suite 600 Kansas City, MO 64108-2415 Chris.bunce@birch.com	Mr. Greg Diamond Broadwing Communications, Inc. c/o Level 3 Communications 1025 Eldorado Boulevard Broomfield, CO 80021-8869 Greg.Diamond@level3.com
Richard Brown Access Point, Inc. 1100 Crescent Green, Suite 109 Cary, NC 27511 Richard.brown@accesspointinc.com	Mr. David Bailey BullsEye Telecom, Inc. 25925 Telegraph Road, Suite 210 Southfield, MI 48033-2527 dbailey@bullseyetelecom.com
Adam C. Gold, P.A. 1501 Sunset Drive, 2 nd Floor Coral Gables, FL 33143 agold@acgoldlaw.com	Paula W. Foley Earthlink Business 5 Wall Street Burlington, MA 01803 pfoley@corp.earthlink.com
Ernest Communications, Inc. 5275 Triangle Parkway, Suite 150 Norcross, GA 30092-6511 lhaag@ernestgroup.com	Flatel, Inc. c/o Adriana Solar Executive Center, Suite 100 2300 Palm Beach Lakes Blvd. West Palm Beach, FL 33409-3307 asolar@flatel.net
Granite Telecommunications, LLC 100 Newport Avenue Extension Quincy, MA 02171-1734 rcurrier@granitenet.com	Andrew M. Klein/Allen C. Zoracki Klein Law Group 1250 Connecticut Ave. NW, Suite 200 Washington, DC 20036 AKlein@kleinlawPLLC.com azoracki@kleinlawpllc.com

<p>John Greive Lightyear Network Solutions, LLC 1901 Eastpoint Parkway Louisville, KY 40223-4145 john.greive@lightyear.net</p>	<p>Michael McAlister Navigator Telecommunications, LLC P.O. Box 13860 North Little Rock, AR 72113-0860 mike@navtel.com</p>
<p>Adam L. Sherr Qwest Communications Company, LLC 1600 7th Avenue, Room 1506 Seattle, WA 98191 Adam.Sherr@centurylink.com</p>	<p>Susan S. Masterton, Esq. CenturyLink QCC 315 S. Calhoun Street, Suite 500 Tallahassee, FL 32301 susan.masterton@centurylink.com</p>
<p>Budget PrePay, Inc. Lakisha Taylor 1325 Barksdale Blvd., Suite 200 Bossier City, LA 71111-4600 davidd@budgetprepay.com</p>	<p>Marsha Rule Rutledge Law Firm Post Office Box 551 Tallahassee, FL 32302 marsha@reuphlaw.com</p>
<p>Ms. Kristin U. Shulman XO Communications 810 Jorie Blvd., Suite 200 Oak Brook, IL 60523 kris.shulman@xo.com</p>	<p>Laura King Division of Regulatory Analysis Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 lking@psc.state.fl.us</p>
<p>Dulaney L. O'Roark III Verizon Florida, LLC 5055 North Point Parkway Alpharetta, GA 30022 678-259-1657 (phone) 678-259-5326 (fax) de.oroark@verizon.com</p>	<p>Ms. Carolyn Ridley tw telecom of florida l.p. 2078 Quail Run Drive Bowling Green, KY 42104 Carolyn.Ridley@twtelecom.com</p>
<p>Pennington Law Firm Howard Adams P.O. Box 10095 Tallahassee, FL 32302 gene@penningtonlaw.com</p>	<p>Ms. Rebecca A. Edmonston Verizon Access Transmission Services 106 East College Avenue, Suite 710 Tallahassee, FL 32301-7721 rebecca.edmonston@verizon.com</p>

<p>Ed Krachmer Windstream NuVox, Inc. 4001 Rodney Parham Road MS: 1170-B1F03-53A Little Rock, AR 72212 Edward.Krachmer@windstream.com</p>	<p>James White Windstream NuVox, Inc. 4651 Salisbury Road, Suite 151 Jacksonville, FL 32256-6187 Bettye.j.willis@windstream.com</p>
<p>Jane J. Whang Davis Wright Tremaine, LLP 505 Montgomery Street, Suite 800 San Francisco, CA 94111-6533 janewhang@dwt.com</p>	<p>Ms. Bettye Willis 13560 Morris Rd., Suite 2500 Milton, GA 30004 Bettye.j.willis@windstream.com</p>

By: 
Matthew Feil, Esq.