

**Eric Fryson**

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**From:** Galloway, Cecilia (Cissy) [CGalloway@gunster.com]  
**Sent:** Tuesday, May 08, 2012 4:33 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'; 'davidd@budgetprepay.com'; Jessica Miller  
**Subject:** RE: PSC Filing Dkt 090538-TP - tw telecom of florida, l.p. Notice of Serving 2nd Req for Admission to Qwest  
**Attachments:** TWTC PSC Notice of 2nd QReq Adm.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](mailto: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:** tw telecom of florida, l.p.

**Total Number of Pages:** 5

**Description of Documents:** tw telecom of florida, l.p.'s Notice of Serving Second Request for Admission to Qwest Communications Co., LLC

REGISTRATION NUMBER 02951

02951 MAY-8 09

FPSC-COMMISSION CLERK

5/8/2012



# GUNSTER

FLORIDA'S LAW FIRM FOR BUSINESS

**Cecilia C. Galloway**  
Governmental Affairs  
215 S. Monroe Street, Suite 601  
Tallahassee, FL 32301  
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**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 8, 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 tw telecom of florida, l.p.'s Notice of Serving its Second Request for Admission 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

RECEIVED  
02951 MAY-8 2012

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,	}	Filed: May 8, 2012
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.	}	

**TW TELECOM OF FLORIDA, L.P.'S NOTICE OF SERVING SECOND REQUESTS FOR ADMISSION TO QWEST COMMUNICATIONS COMPANY, LLC**

TW TELECOM OF FLORIDA, L.P.'S ("TWTC", or "the Company"), by and through its undersigned counsel, hereby gives notice that the Company has served its Second Requests for Admission 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 8th 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

02951 MAY-8 2012  
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### 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 8th day of May, 2012.

Lee Eng Tan Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <a href="mailto:ltan@psc.state.fl.us">ltan@psc.state.fl.us</a>	Eric J. Branfman/Philip J. Macres Bingham Law Firm 2020 K Street, NW Washington, DC 20006 <a href="mailto:eric.branfman@bingham.com">eric.branfman@bingham.com</a> <a href="mailto:Philip.macres@bingham.com">Philip.macres@bingham.com</a>
Mr. Chris Bunce Birch Communications, Inc. 2300 Main Street, Suite 600 Kansas City, MO 64108-2415 <a href="mailto:Chris.bunce@birch.com">Chris.bunce@birch.com</a>	Mr. Greg Diamond Broadwing Communications, Inc. c/o Level 3 Communications 1025 Eldorado Boulevard Broomfield, CO 80021-8869 <a href="mailto:Greg.Diamond@level3.com">Greg.Diamond@level3.com</a>
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Granite Telecommunications, LLC 100 Newport Avenue Extension Quincy, MA 02171-1734 <a href="mailto:rcurrier@granitenet.com">rcurrier@granitenet.com</a>	Andrew M. Klein/Allen C. Zoracki Klein Law Group 1250 Connecticut Ave. NW, Suite 200 Washington, DC 20036 <a href="mailto:AKlein@kleinlawPLLC.com">AKlein@kleinlawPLLC.com</a> <a href="mailto:azoracki@kleinlawpllc.com">azoracki@kleinlawpllc.com</a>

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<p>Adam L. Sherr  Qwest Communications Company, LLC  1600 7th Avenue, Room 1506  Seattle, WA 98191  <a href="mailto:Adam.Sherr@centurylink.com">Adam.Sherr@centurylink.com</a></p>	<p>Susan S. Masterton, Esq.  CenturyLink QCC  315 S. Calhoun Street, Suite 500  Tallahassee, FL 32301  <a href="mailto:susan.masterton@centurylink.com">susan.masterton@centurylink.com</a></p>
<p>Budget PrePay, Inc.  Lakisha Taylor  1325 Barksdale Blvd., Suite 200  Bossier City, LA 71111-4600  <a href="mailto:davidd@budgetprepay.com">davidd@budgetprepay.com</a></p>	<p>Marsha Rule  Rutledge Law Firm  Post Office Box 551  Tallahassee, FL 32302  <a href="mailto:marsha@reuphlaw.com">marsha@reuphlaw.com</a></p>
<p>Ms. Kristin U. Shulman  XO Communications  810 Jorie Blvd., Suite 200  Oak Brook, IL 60523  <a href="mailto:kris.shulman@xo.com">kris.shulman@xo.com</a></p>	<p>Laura King  Division of Regulatory Analysis  Florida Public Service Commission  2540 Shumard Oak Boulevard  Tallahassee, FL 32399  <a href="mailto:lking@psc.state.fl.us">lking@psc.state.fl.us</a></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)  <a href="mailto:de.oroark@verizon.com">de.oroark@verizon.com</a></p>	<p>Ms. Carolyn Ridley  tw telecom of florida l.p.  2078 Quail Run Drive  Bowling Green, KY 42104  <a href="mailto:Carolyn.Ridley@twtelecom.com">Carolyn.Ridley@twtelecom.com</a></p>
<p>Pennington Law Firm  Howard Adams  P.O. Box 10095  Tallahassee, FL 32302  <a href="mailto:gene@penningtonlaw.com">gene@penningtonlaw.com</a></p>	<p>Ms. Rebecca A. Edmonston  Verizon Access Transmission Services  106 East College Avenue, Suite 710  Tallahassee, FL 32301-7721  <a href="mailto:rebecca.edmonston@verizon.com">rebecca.edmonston@verizon.com</a></p>

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

By:   
Matthew Feil, Esq.