

**Eric Fryson**

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**From:** Garcia, Nicki [NGarcia@gunster.com]  
**Sent:** Friday, September 28, 2012 3:58 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Feil, Matthew; Garcia, Nicki  
**Subject:** Electronic Filing - Docket No. 090538-TP  
**Attachments:** 090538-TP twt Response to Qwest 9-28-12.pdf

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  
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**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.; 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:** 4

**Description of Documents:** tw telecom of florida, l.p.'s Notice of Serving its Responses to Qwest Communications Company, LLC.



**GUNSTER**

FLORIDA'S LAW FIRM FOR BUSINESS

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DOCUMENT NUMBER-DATE

06533 SEP 28 2012

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9/28/2012

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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.

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September 28, 2012

**ELECTRONIC FILING**

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

**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.; 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 Responses to Qwest Communications Company, LLC's Second Set of Interrogatories, Second Set of Document Requests and First Set of Requests for Admission, submitted by electronic mail in the above-referenced docket.

Sincerely,



Matthew J. Feil  
Of Counsel Shareholder

Enclosures

DOCUMENT NUMBER-DATE

06533 SEP 28 12

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of Qwest Communications Company, LLC against MCImetro Access Transmission Services (d/b/a Verizon Access Transmission Services); tw telecom of florida, l.p.; Granite Telecommunications, LLC; Broadwing Communications, LLC; Budget Prepay, Inc.; Bullseye Telecom, Inc.; DeltaCom, Inc.; Ernest Communications, Inc.; Flatel, Inc.; Navigator Telecommunications, LLC; PaeTec Communications, Inc.; Saturn Telecommunications, LLC; US LEC of Florida, LLC; Windstream Nuvox, Inc.; and John Does 1 through 50, for unlawful discrimination.

Docket No. 090538-TP

Filed: September 28, 2012

**TW TELECOM OF FLORIDA, L.P.'S NOTICE OF SERVING ITS RESPONSES TO QWEST COMMUNICATIONS COMPANY, LLC'S SECOND SET OF INTERROGATORIES, SECOND SET OF DOCUMENT REQUESTS AND FIRST SET OF REQUESTS FOR ADMISSION**

tw telecom of florida, l.p. ("TWTC," or "the Company"), by and through its undersigned counsel, hereby gives notice that the Company has served its response to Qwest Communications Company, LLC's Second Set of Interrogatories (Nos. 9 - 12), Second Set of Document Requests (Nos. 6 - 9) and First Set of Requests for Admission (Nos. 1 - 2) by electronic mail and/or U.S. Mail to Mr. Adam Sherr of Qwest and Ms. Susan Masterton of Century Link. Copies of the response have been provided to parties consistent with the attached Certificate of Service.

This notice is respectfully submitted by electronic mail the 28<sup>th</sup> day of September, 2012.



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

DOCUMENT NUMBER-DATE

06533 SEP 28 12

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 28th day of September, 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>	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>
Michael J. Shortley, III Vice President – Legal Level 3 Communications 225 Kenneth Drive Rochester, New York, 14623 <a href="mailto:michael.shortley@level3.com">michael.shortley@level3.com</a>	Mr. David Bailey BullsEye Telecom, Inc. 25925 Telegraph Road, Suite 210 Southfield, MI 48033-2527 <a href="mailto:dbailey@bullseyetelecom.com">dbailey@bullseyetelecom.com</a>
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<p>Adam L. Sherr  Qwest Communications Company, LLC  1600 7th Avenue, Room 1506  Seattle, WA 98191  <u>Adam.Sherr@centurylink.com</u></p>	<p>Susan S. Masterton, Esq.  CenturyLink QCC  315 S. Calhoun Street, Suite 500  Tallahassee, FL 32301  <u>susan.masterton@centurylink.com</u></p>
<p>Budget PrePay, Inc.  Lakisha Taylor  1325 Barksdale Blvd., Suite 200  Bossier City, LA 71111-4600  <u>davidd@budgetprepay.com</u></p>	<p>Ms. Carolyn Ridley  tw telecom of florida l.p.  2078 Quail Run Drive  Bowling Green, KY 42104  <u>Carolyn.Ridley@twtelecom.com</u></p>
<p>Jessica Miller  Florida Public Service Commission  2540 Shumard Oak Boulevard  Tallahassee, FL 32399  <u>JEMiller@psc.state.fl.us</u>  <u>BSalak@psc.state.fl.us</u></p>	<p>Ms. Rebecca A. Edmonston  Verizon Access Transmission Services  106 East College Avenue, Suite 710  Tallahassee, FL 32301-7721  <u>rebecca.edmonston@verizon.com</u></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)  <u>de.oroark@verizon.com</u>  <u>richard.b.severy@verizon.com</u></p>	<p>Ed Krachmer  Windstream NuVox, Inc.  4001 Rodney Parham Road  MS: 1170-B1F03-53A  Little Rock, AR 72212  <u>Edward.Krachmer@windstream.com</u></p>

By:   
Matthew Feil, Esq.