

Eric Fryson

From: Marsha Rule [Marsha@reuphlaw.com]
Sent: Monday, October 01, 2012 4:40 PM
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Person Responsible for Filing:

Marsha E. Rule, Attorney

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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.; 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:

Broadwing Communications, LLC

Total Number of Pages:

Description of Documents:

Broadwing's notice of serving discovery responses 4

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DOCUMENT NUMBER-DATE

06617 OCT-1 2

FPSC-COMMISSION CLERK

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, }
LLC; Broadwing Communications, LLC; Access }
Point, Inc.; Birch Communications, Inc.; Budget } Filed: October 1, 2012
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. }

**BROADWING COMMUNICATIONS LLC'S NOTICE OF SERVING ITS
OBJECTIONS AND RESPONSES
TO QWEST COMMUNICATIONS COMPANY, LLC'S
THIRD SET OF INTERROGATORIES (NOS. 13-19)
AND THIRD DOCUMENT REQUESTS (NOS. 11-22)**

Broadwing Communications LLC hereby files and serves Notice that on this day it has served its objections and responses to the above-referenced discovery requests propounded by Qwest Communications Company, LLC by electronic mail and U.S. Mail to Mr. Adam L. Sherr, Qwest Communications Company, LLC, 1600 7th Avenue, Room 1506, Seattle, WA 98191, (adam.sherr@centurylink.com) and Susan S. Masterton, Century Link QCC, 315 South Calhoun Street, Suite 500, Tallahassee, FL 32301, (susan.masterton@centurylink.com); with copies to the persons and in the manner listed on the certificate of service below.

Respectfully submitted this 1st day of October, 2012.

DOCUMENT NUMBER-DATE

06617 OCT-1 2012

FPSC-COMMISSION CLERK

/s/ Marsha E. Rule

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and

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*Attorneys for Broadwing
Communications, LLC*

CERTIFICATE OF SERVICE

I hereby certify the foregoing has been served by U. S. mail or email to the following persons on this 1st day of October, 2012:

Lee Eng Tan Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 ltan@psc.state.fl.us	Jessica Miller Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 jemiller@psc.state.fl.us
Matt Feil Gunster Law Firm 215 South Monroe, Suite 601 Tallahassee, FL 32301 mfeil@gunster.com	Michael J. Shortley, III, Esq. Level 3 Communications 225 Kenneth Drive Rochester, New York, 14623 Michael.shortley@level3.com

<p>Budget PrePay, Inc. 1325 Barksdale Boulevard Suite 200 Bossier City, LA 71111-4600 ddavid@budgetprepay.com</p>	<p>Mr. David Bailey BullsEye Telecom, Inc. 25925 Telegraph Road, Suite 210 Southfield, MI 48033-2527 dbailey@bullseyetelecom.com</p>
<p>Jane Whang Davis Wright Tremaine LLP 505 Montgomery Street, Suite 800 San Francisco, CA 94111 janewhang@dwt.com</p>	<p>Paula Foley One Communications, an Earthlink Business Company 5 Wall Street Burlington, MA 01803 pfoley@corp.earthlink.com</p>
<p>Ernest Communications, Inc. 5275 Triangle Parkway, Suite 150 Norcross, GA 30092-6511 lhaag@earnestgroup.com</p>	<p>Flatel, Inc. Executive Center, Suite 100 2300 Palm Beach Lakes Blvd. West Palm Beach, FL 33409-3307</p>
<p>Granite Telecommunications, LLC 100 Newport Avenue Extension Quincy, MA 02171-1734 rcurrier@granitenet.com</p>	<p>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>
<p>Adam L. Sherr Qwest Communications Company, LLC 1600 7th Avenue, Room 1506 Seattle, WA 98191 Adam.Sherr@qwest.com</p>	<p>Susan S. Masterton Century Link QCC 315 South Calhoun Street, Suite 500 Tallahassee, FL 32301 Susan.masterton@centurylink.com</p>
<p>Alan C. Gold, P.A. 1501 Sunset Drive, 2nd Floor Coral Gables, FL 33143 acgold@acgoldlaw.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>Brenda Merritt Division of Regulatory Analysis Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 bmerritt@psc.state.fl.us</p>	<p>Mr. David Christian Verizon Access Transmission Services 106 East College Avenue, Suite 710 Tallahassee, FL 32301-7721 david.christian@verizon.com</p>

<p>Dulaney L. O'Roark III Verizon 5055 North Point Parkway Alpharetta, GA 30022 678-259-1657 (phone) 678-259-5326 (fax) <u>de.oroark@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>
<p>Ms. Kristin Shulman XO Communications 810 Jorie Blvd. Suite 200 Oak Brook IL 60523 <u>Kris.Shulman@xo.com</u></p>	<p>James White Windstream NuVox, Inc. 4651 Salisbury Road, Suite 151 Jacksonville, FL 32256-6187 <u>Bettye.j.willis@windstream.com</u></p>

/s/ Marsha E. Rule

Marsha E. Rule