

**Eric Fryson**

**From:** Garcia, Nicki [NGarcia@gunster.com]  
**Sent:** Thursday, October 04, 2012 1:36 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Lee Eng Tan; Jessica Miller; Feil, Matthew; 'davidd@budgetprepay.com'; 'dbailey@bullseyetelecom.com'; 'pfoley@corp.earthlink.com'; 'lhaag@ernestgroup.com'; 'asolar@flatel.net'; 'rcurrier@granitenet.com'; 'AKlein@kleinlawPLLC.com'; 'azoracki@kleinlawpllc.com'; 'Adam.Sherr@qwest.com'; 'marsha@reuphlaw.com'; 'Susan.masterton@centurylink.com'; 'Carolyn.Ridley@twtelecom.com'; 'Rebecca.edmonston@verizon.com'; Beth Salak; 'Edward.Krachmer@windstream.com'; 'de.oroark@verizon.com'; 'Bettye.j.willis@windstream.com'; 'acgold@acgoldlaw.com'; 'Richard.b.severy@verizon.com'; 'david@navtel.com'; 'michael.shortley@level3.com'  
**Subject:** Electronic Filing - Docket No. 090538-TP

**Attachments:** 090538-twt Filing of Affidavits of Wood and Jones.pdf

Attached is an electronic filing for the docket referenced below. If you have any questions, please contact Matt Feil. 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.; 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:** 6

**Description of Documents:** Filing of Affidavits

Thank you.



**GUNSTER**  
 FLORIDA'S LAW FIRM FOR BUSINESS

Nicki Garcia | Office Manager  
 Assistant to Lila A. Jaber  
 215 S. Monroe Street, Suite 601  
 Tallahassee, FL 32301  
 P 850-521-1710 C 850-321-0547

DOCUMENT NUMBER-DATE

06753 OCT-4 2012

FPSC-COMMISSION CLERK

10/4/2012

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**GUNSTER**  
FLORIDA'S LAW FIRM FOR BUSINESS

Writer's Direct Dial number: (850) 521-1708  
Writer's E-Mail Address: mfeil@gunster.com

October 4, 2012

**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.; 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:

Please be advised that tw telecom of florida, l.p. ("TWTC") hereby files and services notice of the affidavits of Don J. Wood and Rochelle D. Jones.

If you have any questions, please contact me at 850-521-1708.

Sincerely,

Matthew Feil

DOCUMENT NUMBER-DATE

06753 OCT-4 2012

**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.

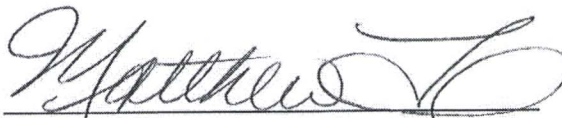
Docket No. 090538-TP

Filed: October 4, 2012

**TWTC'S NOTICE OF FILING  
AFFIDAVITS SUPPORTING DISCOVERY RESPONSES**

tw telecom of florida, l.p., ("TWTC") hereby files and serves notice that on this day it has filed the attached affidavits of Don J. Wood and Rochelle D. Jones supporting the discovery responses described therein.

RESPECTFULLY SUBMITTED this 4<sup>th</sup> day of October, 2012.



Matthew Feil  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
850-521-1708  
mfeil@gunster.com

DOCUMENT NUMBER-DATE

06753 OCT-4 2012

FPSC-COMMISSION CLERK

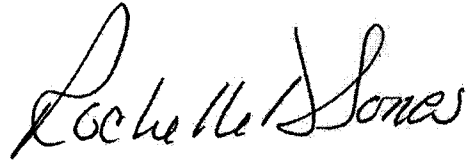
**AFFIDAVIT**

STATE OF NEW YORK)

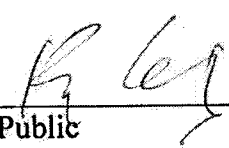
COUNTY OF New York)

I hereby certify that on this 1 day of Oct, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared ROCHELLE D. JONES, who is personally known to me OR provided \_\_\_\_\_ as identification, and she acknowledged before me that she provided the responses to the applicable portions of the following interrogatories, including any supplements thereto, in FPSC Docket No. 090538-TP, and that such are true and correct based on his/her personal knowledge:

Qwest Interrogatories Nos. 10(b) and 10(c).



In witness whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 1<sup>st</sup> day of Oct, 2012.

  
\_\_\_\_\_  
Notary Public  
State of Florida, at Large

My Commission Expires:

**RAY SHANG**  
Notary Public, State of New York  
No. 01CH0198017  
Qualified in Queens County  
Commission Expires December 8, 2012

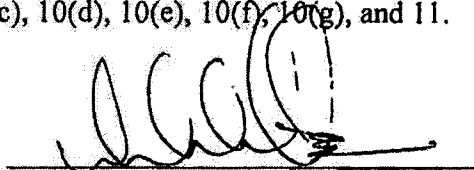
AFFIDAVIT

STATE OF GEORGIA)

COUNTY OF Cobb)

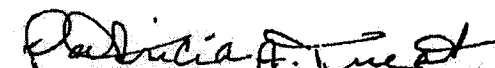
I hereby certify that on this 2<sup>nd</sup> day of OCTOBER, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared DON J. WOOD, who is personally known to me OR provided DRIVERS LICENSE as identification, and he acknowledged before me that he provided the responses to the applicable portions of the following interrogatories, including any supplements thereto, in FPSC Docket No. 090538-TP, and that such are true and correct based on his/her personal knowledge:

Qwest Interrogatories Nos. 10(a), 10(b), 10(c), 10(d), 10(e), 10(f), 10(g), and 11.



Don J. Wood

In witness whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 2<sup>nd</sup> day of October, 2012.



Notary Public  
State of Georgia

My Commission Expires:

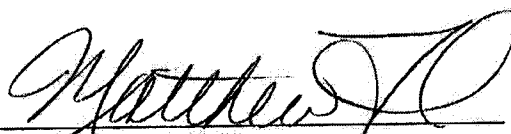
August 24, 2016

### 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 4<sup>th</sup> day of October, 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>
Alan C. Gold, P.A. 1501 Sunset Drive, 2 <sup>nd</sup> Floor Coral Gables, FL 33143 <a href="mailto:agold@acgoldlaw.com">agold@acgoldlaw.com</a>	Paula W. Foley Earthlink Business 5 Wall Street Burlington, MA 01803 <a href="mailto:pfoley@corp.earthlink.com">pfoley@corp.earthlink.com</a>
Ernest Communications, Inc. 5275 Triangle Parkway Suite 150 Norcross, GA 30092-6511 <a href="mailto:lhaag@ernestgroup.com">lhaag@ernestgroup.com</a>	Flatel, Inc. c/o Adriana Solar Executive Center, Suite 100 2300 Palm Beach Lakes Blvd. West Palm Beach, FL 33409-3307 <a href="mailto:asolar@flatel.net">asolar@flatel.net</a>
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>
Marsha Rule Rutledge Law Firm Post Office Box 551 Tallahassee, FL 32302 <a href="mailto:marsha@reuphlaw.com">marsha@reuphlaw.com</a>	David Stotemyer Navigator Telecommunications, LLC. P.O. Box 13860 North Little Rock, AR 72113 <a href="mailto:david@navtel.com">david@navtel.com</a>

<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>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>Jessica Miller Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 <a href="mailto:JEMiller@psc.state.fl.us">JEMiller@psc.state.fl.us</a> <a href="mailto:BSalak@psc.state.fl.us">BSalak@psc.state.fl.us</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>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> <a href="mailto:richard.b.severy@verizon.com">richard.b.severy@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>

By:   
Matthew Feil, Esq.