

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Intrado Communications Inc.)
for arbitration to establish an interconnection) Docket No. 080134-TP
agreement with Verizon Florida LLC, pursuant)
to Section 252(b) of the Communications Act)
of 1934, as amended, and Section 364.12, F.S.)

**INTRADO COMMUNICATIONS INC.’S
RESPONSE TO STAFF’S FIRST SET OF PRODUCTION OF DOCUMENTS
(NOS. 1-3)**

Intrado Communications Inc. (“Intrado Comm”) hereby responds to the First Set of Production of Documents (Nos. 1-3) from Staff of the Florida Public Service Commission (“Commission”) as follows.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please provide a copy of all documents that support your response to Interrogatory No. 4.

INTRADO COMM RESPONSE:

Relevant excerpts from the following are set forth in Attachment 1: *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, 19 FCC Rcd 13494, ¶ 28 (2004)

2. In his direct testimony at page 41, lines 10 through 14, Intrado witness Hicks refers to a “success” that Verizon has had with AT&T in California regarding ALI steering table synchronization. Please provide the appropriate pages from the document that Verizon and AT&T California are operating under that specifically addresses “ALI steering tables.”

INTRADO COMM RESPONSE:

Intrado Comm does not possess any documents responsive to this request. Intrado Comm witness Hicks’ discussion of the ALI steering arrangements between Verizon and AT&T in California was based on his experience, personal knowledge, and discussions with the California 911 Office.

3. Please provide the most recent working draft of the interconnection agreement that Intrado and Verizon are negotiating.

INTRADO COMM RESPONSE:

Please see Attachment 2, which contains the most recent working draft of the interconnection agreement and sets forth each Party's proposed language.

Respectfully submitted this 30th day of July, 2009.

Respectfully submitted,

INTRADO COMMUNICATIONS INC.

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