

JAMES MEZA III  
Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
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(305) 347-5561

September 7, 2001

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

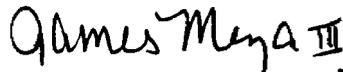
**Re: Docket No. 010740-TP (IDS Complaint)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s *Second Amended* Notice of Depositions and Depositions Duces Tecum, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

  
James Meza III (LA)

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

DOCUMENT NUMBER-DATE

11150 SEP-7 01

FPSC-COMMISSION CLERK

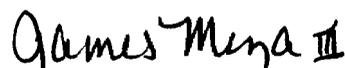
**CERTIFICATE OF SERVICE**  
**Docket No. 010740-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
by Electronic Mail (\*) and Federal Express this 7th day of September, 2001 to the  
following:

Mary Anne Helton (\*)  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Te. No. (850) 413-6096  
[mhelton@psc.state.fl.us](mailto:mhelton@psc.state.fl.us)

Suzanne Fannon Summerlin (\*) (+)  
1311-B Paul Russell Road  
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Tallahassee, Florida 32301  
Tel. No. (850) 656-2288  
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[summerlin@nettally.com](mailto:summerlin@nettally.com)  
Represents IDS

Michael Noshay, President  
IDS Long Distance, Inc.  
n/k/a IDS Telcom, LLC  
1525 N.W. 167th Street  
Second Floor  
Miami, Florida 33169  
Tel. No. (305) 913-4000  
Fax No. (305) 913-4039  
[mnoshay@idstelcom.com](mailto:mnoshay@idstelcom.com)



James Meza III (LA)

**(+) Signed Protective Agreement**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of IDS Long Distance, Inc. ) Docket No.: 010740-TP  
n/k/a IDS Telecom, L.L.C., Against )  
BellSouth Telecommunications, Inc., and )  
Request for Emergency Relief ) Filed: September 7, 2001  
\_\_\_\_\_ )

**SECOND AMENDED NOTICE OF DEPOSITIONS  
AND DEPOSITIONS DUCES TECUM**

TO: Suzanne Fannon Summerlin  
1311-B Paul Russell Road  
Suite 201  
Tallahassee, Florida 32301

PLEASE TAKE NOTICE that BellSouth Telecommunications, Inc. ("BellSouth"), through its counsel, will take depositions upon oral examination for all purposes pursuant to the Florida Rules of Civil Procedure for the following persons:

September 11-14, 2001, beginning at 8:30 a.m. on each day.

Keith Kramer  
Rebecca Wellman  
Bill Gulas  
Bradford Hamilton  
Angel Lerio  
*Robert Hacker*  
*David Allen*  
Keith Kramer's Secretary from January through March, 2000.

The witnesses will be deposed in the order provided above. The depositions will be held at the offices of IDS Long Distance, Inc. n/k/a IDS Telecom, L.L.C., 1525 N.W. 167th Street, Second Floor, in Miami, Florida and will be conducted before an authorized officer in accordance with the Florida Rules of Civil Procedure. The depositions will continue from day-to-day until finished. Each deponent is to bring with them all working papers and documents relied on in their prefiled testimony in this

matter. *In addition, Keith Kramer is to bring with him all documents IDS provided to the office of the Attorney General for the State of Florida regarding or relating to BellSouth and/or IDS' Complaint in the instant proceeding.*

Respectfully submitted this 7th day of September, 2001.

*Nancy B. White*

NANCY B. WHITE (KA)

JAMES MEZA III

c/o Nancy Sims

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*R. Douglas Lackey*

R. DOUGLAS LACKEY (KA)

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Atlanta, GA 30375

(404) 335-0747

COUNSEL FOR BELL SOUTH  
TELECOMMUNICATIONS, INC.

cc: Court Reporter