Matilda Sanders

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From	
rrom.	

Griffin, Kecia (CAO) [KGRIFFIN@miamidade.gov]

Sent:

Thursday, October 05, 2006 12:40 PM

To:

Filings@psc.state.fl.us

Cc:

Hope, David (Airport); Lee, Cynji (Airport); Martin B. Goldberg; Jean L. Kiddoo; James Meza; Danielle C. Burt;

ORIGINAL

Sharon Liebman

Subject:

PSC Second Response

Attachments: PSC Second Response to PSC Staff First Request for Production).pdf

October 5, 2006

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

Re:

Complaint by BellSouth Telecommunication, Inc., Regarding the Operation of a Telecommunication Company by Miami-Dade County in Violation of Florida Statutes and Commission Rules

(Docket No. 050257)

Dear Mrs. Bayó:

Enclosed is an original Miami-Dade County's Secodn Response to Staff's First Request for Production.

Copies have been served via mailed Federal Expressed to the parties shown on the attached Certificate of Service.

cc: All Parties of Record David Stephen Hope Cynji Lee

CMP ____
COM ___
CTR ___
ECR ___
GCL Responses forwarded
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SGA ___
SEC ___
OTU

DOCUMENT NUMBER-DATE

09209 OCT-58

FPSC-COMMISSION CLERK

10/5/2006

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth	
Telecommunications, Inc., Regarding	
The Operation of a Telecommunications	
Company by Miami-Dade County in	
Violation of Florida Statutes and	
Commission Rules	

Docket No. 050257

MIAMI-DADE COUNTY'S SECOND RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION

Miami-Dade County (the "County"), by and through its undersigned counsel, hereby serves its additional answer to the Florida Public Service Commission Staff's First Request for Production (the "Request") and states:

1. Regarding Request No. 3, said additional answer is produced for inspection and copying, pursuant to the Request and bates stamped MDC_PSC(3) 000001 through MDC_PSC(3) 000010.

RESPECTFULLY SUBMITTED,

MURRAY A. GREENBERG MIAMI-DADE COUNTY ATTORNEY

Stephen P. Clark Center 111 Northwest 1st Street, Suite 2800 Miami, Florida 33128-1993

Tel: (305) 375-5151 Fax: (305) 375-5611

By 🛶

David Stephen Hope

Assistant County Attorney
Florida Bar No. 87718

DHope@miami-airport.com

DHope@miamidade.gov

C:\Data\dsh\Discovery\BellSouth Telecommunications (PSC Second Response to PSC Staff First Request for Production), DOC

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed Federal

Express, this 5th day of October 2006, to:

Adam Teitzman, Esq.

Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Martin B. Goldberg, Esq.

Lash & Goldberg LLP Bank of America Tower Suite 1200 100 Southwest 2nd Street Miami, Florida 33131-2158

James Meza, Esq.

Sharon R. Liebman, Esq.

c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida, 32301

E. Earl Edenfield, Jr., Esq.

BellSouth Telecommunications, Inc. 675 West Peachtree Street, N.E., Suite 4300 Atlanta, Georgia 30375

Jean L. Kiddoo, Esq.
Danielle C. Burt, Esq.
Bingham McCutchen LLP
3000 K Street NW, Suite 300
Washington, D.C. 20007-5116

David Stephen Hope

Assistant County Attorney

@ BELLSOUTH

Vandor=Bel Scott - Client=LUX - 1PN=WA - ED=250494/6 - E

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----Vendor Code Amount Account Name

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