



# Supra Telecom

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SCANNED

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ORIGINAL

February 11, 1999

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 981250-TL

Dear Ms. Bayó ,

Enclosed are the original and one copy of Supra Telecommunications and Information Systems, Inc.'s Notice of Service of First Supplemental Request for Production of Documents to BellSouth which we ask that you file in the above-captioned matter.

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,

David V. Dimlich, Esq.  
Legal Counsel  
Supra Telecommunications &  
Information Systems, Inc.  
2620 S.W. 27<sup>th</sup> Ave.  
Miami, FL 33133

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FPSC-RECORDS/REPORTING

**DOCKET 981250-TL  
CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail this 11<sup>th</sup> day of February, 1999 to the following:

Beth Keating, Esq.  
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Florida Public Service Commission  
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Washington, DC 20036



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DAVID V. DIMLICH

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition for Temporary Waiver of Physical )  
Collocation Requirements Set Forth in the ) Docket No. 981250-TL  
1996 Telecommunications Act and the FCC's )  
First Report and Order, for the Lake ) Dated: February 11, 1999  
Mary Main Central Office, by BellSouth )  
Telecommunications, Inc. )

**Supra Telecommunications and Information Systems, Inc.'s  
First Supplemental Request for Production of Documents to  
BellSouth Telecommunications, Inc.**

Pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, Supra Telecommunications & Information Systems, Inc. ("Supra") by and through its undersigned attorney, request BellSouth Telecommunications, Inc., ("BellSouth") to produce the following documents for inspection and copying at the legal offices of Supra, 2620 S.W. 27<sup>th</sup> Avenue, Miami, Florida, or at such other place as may be mutually agreed upon by counsel.

**INSTRUCTIONS AND DEFINITIONS**

1. If any document is withheld under any claim of privilege, furnish a list identifying each document for which a privilege is claimed, together with the following information: Date, sender, recipients, recipients of copies, subject matter of documents, and the basis upon which such privilege is claimed.

2. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including but not limited to correspondence, e-mail, memoranda, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets,

reports, surveys, minutes of statistical compilations, computer records or tapes or printouts; and a copy of such writing or record where the original is not in the possession, custody or control of BellSouth.

3. If BellSouth has possession, custody, or control of the originals of the documents requested, please produce the original or a complete copy of the originals and all copies which are different in any way from the original, whether by interlineation, receipt stamp or notation. If BellSouth does not have possession, custody, or control of the originals of the documents requested, please produce any copies in the possession, custody, or control, however made, of BellSouth.

4. Any objection, whether in whole or in part, to production of the requested documents that claims confidentiality of any document should, under the applicable rules, be accompanied by a motion for protective order. If you wish to utilize a protective agreement regarding such documents, please notify Supra at least ten (10) days prior to the discovery due date, of your desire to resolve informally the objection based upon a claim of confidentiality.

5. "BellSouth" means the entities to which this Request is addressed, their parents, predecessors, successors, subsidiaries, divisions, departments, affiliates, and other persons acting on behalf of any of them, including any consultants, attorneys, or other agents having control, custody, knowledge, or possession or, or responsibility for, any documents called for by this Request.

6. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to bring within the scope of this Request any

documents that might otherwise be construed to be outside the cope of any particular request.

7. No documents created prior to January 1, 1995, need be provided in response to these Requests except where otherwise specifically requested.

**DOCUMENTS REQUESTED**

1. All documents provided by BellSouth in response to the Florida Public Service Commission Staff's First Request for Production of Documents (No. 1) served January 26, 1999 in this proceeding.
2. All documents provided by BellSouth in response to WorldCom Technologies, Inc.'s First Request for Production of Documents (Nos. 1-5) served September 8, 1998 in this proceeding.

Respectfully submitted this 11<sup>th</sup> day of February, 1999.



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DAVID V. DIMLICH, ESQ.  
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2620 S.W. 27<sup>th</sup> Avenue  
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