# ORIGINAL

JAMES MEZA III Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561



Legal Department

August 29, 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 Notice of Deposition and Depositions Duces Tecum for Keith Kramer, Rebecca Wellman, Bill Gulas, Bradford Hamilton, and Angel Lerio, 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. ames-James Meza III

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

APP CAF CMP COMP COTR ECR LEG OPC PAJ RGO SEC SER OTH

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#### 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 29th day of August, 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

Suzanne Fannon Summerlin (+) 1311-B Paul Russell Road Suite 201 Tallahassee, Florida 32301 Tel. No. (850) 656-2288 Fax No. (850) 656-5589 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

James Meyan

James Meza III ( (LA)

(+) Signed Protective Agreement

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Filed: August 29, 2001

## NOTICE OF DEPOSITION 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

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. Respectfully submitted this 29th day of August, 2001.

Augusi, ... Mancy B. White MHITE (KA) c/o Nancy Sims Suite 400 150 South Monroe Street Tallahassee, FL 32301 (305) 347-5558

Patrick W. Turner

R. DOUGLAS LACKEY (KA) PATRICK W. TURNER Suite 4300, BellSouth Center 675 W. Peachtree Street, N.E. Atlanta, GA 30375 (404) 335-0747

COUNSEL FOR BELLSOUTH TELECOMMUNICATIONS, INC.

cc: Court Reporter