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July 31, 2003

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

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**RE: Docket No. 030349-TP -
SUPRA's RESPONSE TO BELLSOUTH'S MOTION TO STRIKE AND
MOTION TO STRIKE EXHIBIT FOUND ON PAGE 12 OF MS.
SUMMERS' REBUTTAL TESTIMONY**

Dear Mrs. Bayo:

Enclosed is the original and seven (7) copies of Supra Telecommunications and Information Systems, Inc.'s (Supra) Response To Bellsouth's Motion To Strike And Motion To Strike Exhibit Found On Page 12 Of Ms. Summers' Rebuttal Testimony in the above captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return it to me.

Sincerely,

Jorge Cruz-Bustillo/LWA
Jorge Cruz-Bustillo
Assistant General Counsel

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CERTIFICATE OF SERVICE
Docket No. 030349-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Facsimile, Hand Delivery, U.S. Mail and/or Federal Express this 31st day of July 2003 to the following:

Ms. Linda Dodson, Esq.
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
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Ms. Nancy B. White, Esq.
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Tallahassee, FL. 32301
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By: Jorge Cruz-Bustillo/vra
JORGE CRUZ-BUSTILLO

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by Supra Telecommunications) Docket No.: 030349
And Information Systems, Inc., regarding)
BellSouth's Use of Carrier to Carrier Information)
_____) Filed: July 31, 2003

SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S
RESPONSE TO BELL SOUTH'S MOTION TO STRIKE
AND
MOTION TO STRIKE
EXHIBIT FOUND ON PAGE 12 OF
MS. SUMMERS' REBUTTAL TESTIMONY

COMES NOW, Supra Telecommunications and Information Systems, Inc.'s ("Supra") files this Response to BellSouth's Motion to Strike filed on July 25, 2003. In support thereof, Supra states the following:

BellSouth in this instance has made public the substance of Operation Sunrise and how the Harmonize feed actually works, including, but not limited to, what MKIS does with the notifications of the switch and what specific information is then forwarded to outside vendors for marketing purposes. Accordingly, any documents fully explaining Operation Sunrise and the Harmonize feed are necessary to corroborate or, if necessary, to impeach BellSouth's representations of how these systems and practices actually work. Without these documents BellSouth would be free to make any representations it likes without the fear that there testimony will be undermined. It is critical to this proceeding that these documents not be stricken.

BellSouth seeks to strike the following exhibits:

(1) DAN1 (A letter BellSouth produced to Supra. Further support for the proposition that this is a BellSouth letter can be found in the bate stamp in the bottom

right hand corner of the letter “BST 18221.” This letter demonstrates that BellSouth did engage in market retention efforts before a conversion was complete.)

(2) DAN6 (Document is entitled -- Competitive Landscape Operating Requirements. This is the Sunrise training material provided by Dick Anderson, a BellSouth employee, in Arbitration V. Bate Stamped 000015-000690) – **This document is necessary for corroboration or, if necessary impeachment of BellSouth’s witnesses.**

(3) DAN7 (BellSouth meeting minutes and accompanying documentation regarding overall Sunrise project. This material was provided by BellSouth in response to a request for production in Arbitration V. Bate Stamped 000691-000986) - **This document is necessary for corroboration or, if necessary impeachment of BellSouth’s witnesses.**

(4) DAN8 (Operation Sunrise Program Overview Document. April 27, 2000 version D. This material was provided by BellSouth in Arbitration V. Bate Stamped 000987-001048). (This document is an earlier draft of the current Document governing Operation Sunrise). **BellSouth does attach a flow chart, to Ms. Summers’ rebuttal testimony, regarding how CLEC service orders are extracted from SOCS, but the exhibit in her testimony is not the actual flow chart that is contained within DAN8. This document is necessary for corroboration or, if necessary impeachment of BellSouth’s witnesses.**

(5) DAN19 (Deposition of Conrad Ponder was taken on June 5, 2002 in Arbitration V. Bate Stamped 001668-001836). **This deposition is being filed in lieu of**

Direct Testimony. Supra intends on calling Mr. Ponder, as a hostile witness, in Supra's case in chief.

Without these documents BellSouth would be free to make any representations it likes without the fear that there testimony will be undermined. It is critical to this proceeding that these documents not be stricken.

WHEREFORE, Supra respectfully requests, for the foregoing reasons, that this Commission not strike the above referenced exhibits.

MOTION TO STRIKE

As stated earlier herein, BellSouth has made public the substance of Operation Sunrise and how the Harmonize feed actually works, including, but no limited to, what MKIS does with the notifications of the switch and what specific information is then forwarded to outside vendors for marketing purposes.

Ms. Summers includes in her rebuttal testimony an exhibit that attempts to diagram the flow process of the CLEC service orders as these orders are harvested from SOCS on a nightly basis. Ms. Summers' diagram is not an accurate depiction of the diagram that is included in BellSouth's Operation Sunrise Program Document. The actual diagram demonstrating the flow of the CLEC service order can be found in #DAN9, Supra Bate Stamped 001055. Supra would move to strike Ms. Summers' diagram as not an accurate depiction of the flow and as such misleading.

WHEREFORE, Supra respectfully requests, for the foregoing reason, that the Commission strike the Summers' diagram.

Respectfully Submitted this 31st day of July 2003.

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& INFORMATION SYSTEMS, INC.
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