

E. EARL EDENFIELD, JR.  
Senior Attorney  
BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0763

October 26, 2004

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

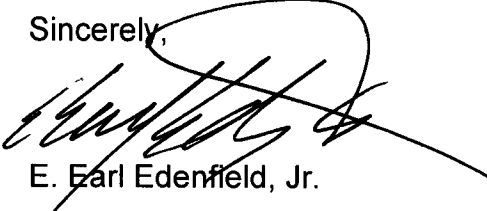
**Re: Docket No.: 040301-TP  
Petition of Supra Telecommunications and Information Systems, Inc. for  
Arbitration with BellSouth Telecommunications, Inc.**

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. served its Supplemental Response to Supra's First Request for Production (Item No. 1).

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



E. Earl Edenfield, Jr.

Enclosure

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

**CERTIFICATE OF SERVICE**  
**Docket No. 040301-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and U.S. Mail this 26<sup>th</sup> day of October, 2004 to the following:

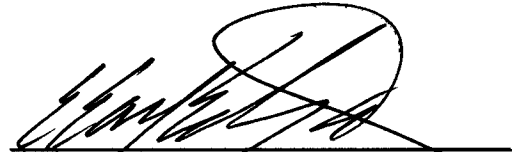
Jason Rojas  
Jeremy Susac  
Staff Counsels  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
Tel No. (850) 413-6179 or 6236  
Fax No. (850) 413-6250  
[jrojas@psc.state.fl.us](mailto:jrojas@psc.state.fl.us)  
[jsusac@psc.state.fl.us](mailto:jsusac@psc.state.fl.us)

Ann H. Shelfer  
Supra Telecommunications &  
Information Systems, Inc.  
Koger Center – Ellis Building  
1311 Executive Center Drive  
Suite 220  
Tallahassee, FL 32301-5067  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
[ashelfer@stis.com](mailto:ashelfer@stis.com)

Brian Chaiken (+)  
Supra Telecommunications &  
Information Systems, Inc.  
2620 S. W. 27<sup>th</sup> Avenue  
Miami, FL 33133  
Tel. No. (305) 476-4248  
Fax. No. (305) 443-1078  
[bchaiken@stis.com](mailto:bchaiken@stis.com)

**To receive discovery related material only**

John Duffey  
Division of Competitive  
Markets & Enforcement  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
Tel No. (850) 413-6828  
[jduffey@psc.state.fl.us](mailto:jduffey@psc.state.fl.us)

  
E. Earl Edenfield, Jr.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

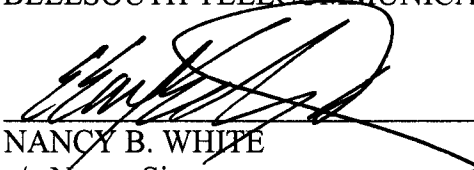
In Re: Petition of Supra Telecommunications )  
and Information Systems, Inc.'s for ) Docket No.: 040301-TP  
arbitration with BellSouth )  
BellSouth Telecommunications, Inc. )  
\_\_\_\_\_ ) Filed: October 26, 2004

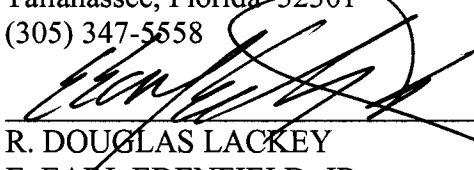
**BELLSOUTH TELECOMMUNICATIONS, INC.'S SUPPLEMENTAL  
RESPONSE TO SUPRA'S FIRST REQUEST FOR PRODUCTION**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to the Order Granting in Part and Denying in Part Supra Telecommunications and Information Systems, Inc.'s Motion to Compel (Order No. PSC-04-1017-PCO-TP) dated October 19, 2004, files the attached Supplemental Response to Item No. 1 of Supra Telecommunications and Information Systems, Inc.'s ("Supra") First Request for Production dated July 22, 2004.

Respectfully submitted this 26<sup>th</sup> day of October 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
NANCY B. WHITE  
c/o Nancy Sims  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301  
(305) 347-5558

  
\_\_\_\_\_  
R. DOUGLAS LACKEY  
E. EARL EDENFIELD, JR.  
675 West Peachtree Street  
Suite 4300  
Atlanta, Georgia 30375  
(404) 335-0763

REQUEST: Please provide all testimonies, transcripts, exhibits, orders, and any related documents in FPSC Docket No. 990649-TP (BellSouth Track) which specifically support BellSouth's claim that the FPSC has already set a UNE-P to UNE-L conversion rate in excess of \$57.00.

RESPONSE:

**FLORIDA DOCKET NO. 990649-TP  
GENERIC UNE COST DOCKET**

**Filed by BST on May 1, 2000**

**Direct Testimony**

Dr. Randall S. Billingsley	RSB 1-11
D. Daonne Caldwell	DDC 1-4
G. David Cunningham	GDC 1-4
W. Keith Milner	WKM-1
Joseph H. Page	JHP-1
Walter S. Reid	WSR 1-4
James W. Stegeman	JWS 1-5
Alphonso J. Varner	AJV-1

**Filed by BST on June 29, 2000**

**Rebuttal Testimony**

Dr. Randall S. Billingsley	RSB 12-17
D. Daonne Caldwell	DDC-5
G. David Cunningham	GDC-5
W. Keith Milner	
Alphonso J. Varner	AJV 1-2

RESPONSE: (Cont.)

**Filed by BST on August 18, 2000**

**Phase II Revised Direct Testimony**

D. Daonne Caldwell	DDC-1 DDC-2 DDC-4 DDC-6 WSR 3-4
Walter S. Reid	
James W. Stegeman	
Alphonso J. Varner	AJV-1

**Filed by BST on August 21, 2000**

**Phase II Rebuttal Testimony**

D. Daonne Caldwell	DDC 7-10
H. B. Greer	
Wiley G. Latham	
W. Keith Milner	WKM-2
Joseph H. Page	JHP 1-4
Ronald M. Pate	
Walter S. Reid	WSR 1-2
James W. Stegeman	JWS-1-2
Alphonso J. Varner	AJV-1

**BST Corrected Revised Direct Exhibit filed on September 5, 2000**

Alphonso J. Varner - Exhibit AJV-1

**BST Rebuttal Testimony Corrections filed on September 11, 2000**

Joseph H. Page - Testimony – JHP-03

RESPONSE: (Cont.)

**Filed by BST on November 8, 2001**

**Direct Testimony**

D. Daonne Caldwell	DDC 1_120
	DDC 2_120
James W. Stegeman	
Jerry Kephart	

**Filed by BST on December 26, 2001**

**Surrebuttal**

D. Daonne Caldwell	DDC 3_120
	DDC 4_120
	DDC 4_120
John A. Ruscilli	
Jerry Kephart	
Thomas G. Williams	TGW 1-3
James Stegeman	JWS-1

**Filed by BST on January 14, 2002**

**Surrebutal Testimony**

John A. Ruscilli

RESPONSE: (Cont.)

**Filed by BST on January 28, 2002**

**Redlined Version of Revised 11/8/01 Direct Testimony**

**D. Daonne Caldwell**

**DDC 1\_120**

**DDC 2\_120**

**James W. Stegeman**

**Jerry Kephart**

**Revised 12/26/01 Surrebutal Testimony**

**D. Daonne Caldwell**

**DDC 3\_120**