

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 RESPONSE TO BELL SOUTH
TELECOMMUNICATIONS, INC.'S FIRST REQUEST FOR ADMISSIONS**

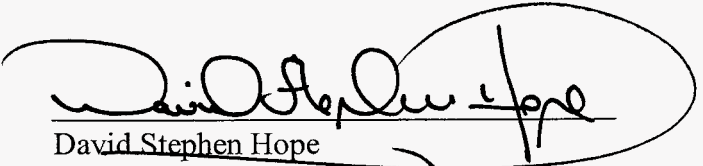
Miami-Dade County (the "County"), by and through its undersigned counsel, hereby serves its Response to BellSouth Telecommunications Inc.'s First Request for Admissions, pursuant to Fla. R. Civ. P. 1.370. The County (i) objects to this request and any subsequent discovery requests propounded in this matter, given the ongoing discovery provided in *BellSouth Telecommunications, Inc. v. Miami-Dade County, Fla.*, Case No. 02-28688 CA 03 (Fla. 11th Cir. Ct. filed Nov. 12, 2002), (ii) does not waive its right to object to future discovery requests, and states:

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1. The County admits to Request Nos. 1, 2, 3, 4 and 5.

Respectfully submitted,

Robert A. Ginsburg
Miami-Dade County Attorney

A handwritten signature in black ink, appearing to read "David Stephen Hope", is written over a horizontal line. The signature is enclosed within a large, hand-drawn oval.

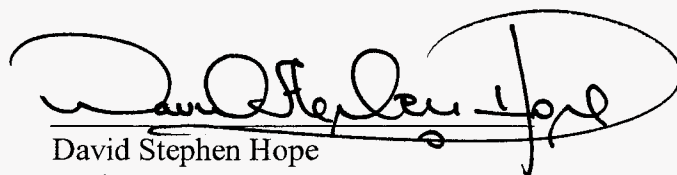
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Counsel for Miami-Dade County

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this *11th* day of July, 2005, to: *Nancy B White, Esq.* and *Sharon R. Liebman, Esq.*, c/o Nancy H. Sims, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, Florida, 32301; and *R. Douglas Lackey, Esq.*, BellSouth Telecommunications, Inc., 675 West Peachtree Street, N.E., Suite 4300, Atlanta, Georgia 30375.

A handwritten signature in black ink, appearing to read "David Stephen Hope", written over a horizontal line. The signature is enclosed within a large, loopy oval shape.

David Stephen Hope
Assistant County Attorney