

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Complaint by Florida BellSouth customers who paid fees to BellSouth Telecommunications, Inc. related to Miami-Dade County Ordinance Section 21-44 ("Manhole Ordinance") and request that Florida Public Service Commission order BellSouth to comply with Section A.2.4.6 of General Subscriber Service Tariff and refund all fees collected in violation thereof.

DOCKET NO. 050194-TL

DATED: JANUARY 31, 2006

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one correct copy of STAFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS TO BELLSOUTH TELECOMMUNICATIONS, INC. (NOS. 14 - 17) has been served by U. S. mail to Nancy White/Sharon Liebman/R. Douglas Lackey, c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301-1556 and that a true copy thereof has been furnished to the following by U. S. mail this 31ST day of January, 2006:

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FPSC-COMMISSION OF ENVIRONMENTAL PROTECTION