

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

RECEIVED-PPSC

05 JUL -5 AM 9:40

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

COMMISSION
CLERK

Docket No. 050257

MIAMI-DADE COUNTY'S RESPONSES TO
STAFF'S FIRST REQUEST FOR PRODUCTION

Miami-Dade County (the "County"), by and through its undersigned counsel, hereby serves its answers to the Florida Public Service Commission Staff's ("Staff") First Request for Production (the "Request") and states:

1. The County answers Staff's First Request for Production, and said answers are produced for inspection and copying, pursuant to the Request.
2. Regarding Request No. 1, there is no such entity called the "MIA Hilton". The hotel located in the terminal building, and to which responsive documents have been provided is named the Miami International Airport Hotel. The entity to which Staff may have mistakenly referenced in the Request is the Hilton Miami Airport, located at 5101 Blue Lagoon Drive,

_____ Miami, Florida 33126. There is neither an ownership or operational affiliation between the
_____ County and the Hilton Miami Airport, nor any telecommunications services provided by either
_____ the County or the Miami-Dade Aviation Department ("MDAD") to the Hilton Miami Airport.

3. Regarding Request No. 2, Mindworks is owned and captured under the entity known as
_____ Stellar Partners.

CMP _____
COM _____
CTR _____
ECR _____
SCL _____
DPC _____
RCA _____
SCR _____
SGA _____
SEC _____

1 (pgs 1-4)

JTH _____ C:\Data\dsh\Discovery\BellSouth Telecommunications (PSC Response to PSC Staff First Request for Production).DOC

DOCUMENT NUMBER-DATE

05913 JUL-5 8

* Pages MDC - PSC(1) 000001 thru MDC - PSC(1) 000019, MDC - PSC(2) 000001 thru
MDC - PSC(2) 000005, + MDC - PSC(4) 000001 detached +
OFFICE OF COUNTY ATTORNEY, MIAMI-DADE COUNTY, FLORIDA

FPSC-COMMISSION CLERK

4. Regarding Request No. 3, Sunglass Hut is not a shared tenant service ("STS") customer of MDAD. MDAD has provided Sunglass Hut with a copy of the Request and asked for a copy of its May 2006 telephone bill. As of the date of this response, Sunglass Hut represented: (i) BellSouth provides its telephone service(s); and (ii) it will attempt to provide an electronic copy of its telephone bill, located at the Ohio corporate offices, and which includes the location(s) at Miami International Airport. The County will forward this information to Staff as soon as practicable.

5. Regarding Request No. 4, the County's current list of customers constitutes a trade secret. § 812.081, Fla. Stat. (2005). "[T]rade secret information as defined in s. 812.081, and as provided for in s. 815.04(3), [is] expressly made confidential and exempt from the public records law" § 815.045, Fla. Stat. (2005). ***The County's current list of customers is confidential and exempt, and is not to be disclosed to third parties or non-Florida Public Service Commission entities. See Sepro Corp. v. Fla. Dep't of Env'tl. Prot., 839 So. 2d 781, 784 (Fla. 1st DCA 2003), review denied sub nom by Crist v. Fla. Dep't of Env'tl. Prot., 911 So. 2d 792 (Fla. 2005) (emphasis added).***

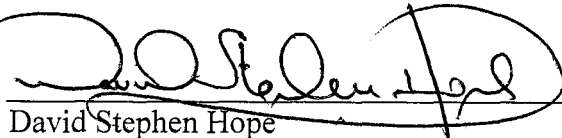
6. Regarding Request No. 5, the documents requested do not exist. Neither the County nor MDAD provide telecommunications services to entities located outside of the physical boundaries or footprint of Miami International Airport or its general aviation airports.

RESPECTFULLY SUBMITTED,

MURRAY A. GREENBERG
MIAMI-DADE COUNTY ATTORNEY

Stephen P. Clark Center
111 Northwest 1st Street, Suite 2800
Miami, Florida 33128-1993
Tel: (305) 375-5151
Fax: (305) 375-5611

By



David Stephen Hope
Assistant County Attorney
Florida Bar No. 87718
DHope@miami-airport.com
DHope@miamidade.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed Federal Express, this *3rd* day of July 2006, to:

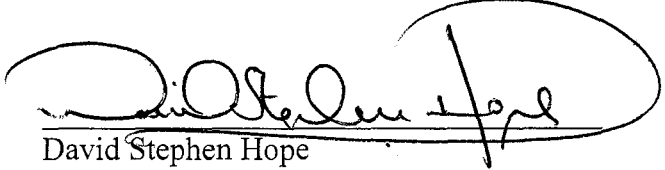
Adam Teitzman, Esq.
Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Martin B. Goldberg, Esq.
Lash & Goldberg LLP
Bank of America Tower
Suite 1200
100 Southwest 2nd Street
Miami, Florida 33131-2158

James Meza, Esq.
Sharon R. Liebman, Esq.
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida, 32301

E. Earl Edenfield, Jr., Esq.
BellSouth Telecommunications, Inc.
675 West Peachtree Street, N.E., Suite 4300
Atlanta, Georgia 30375

Jean L. Kiddoo, Esq.
Danielle C. Burt, Esq.
Bingham McCutchen LLP
3000 K Street NW, Suite 300
Washington, D.C. 20007-5116


David Stephen Hope
Assistant County Attorney