

Matilda Sanders

ORIGINAL

From: Griffin, Kecia (CAO) [KGRIFFIN@miamidade.gov]
 Sent: Thursday, October 05, 2006 12:40 PM
 To: Filings@psc.state.fl.us
 Cc: Hope, David (Airport); Lee, Cynji (Airport); Martin B. Goldberg; Jean L. Kiddoo; James Meza; Danielle C. Burt; Sharon Liebman
 Subject: PSC Second Response
 Attachments: PSC Second Response to PSC Staff First Request for Production).pdf

October 5, 2006

Mrs. Blanca S. Bayó
 Director, Division of the Commission
 Clerk and Administrative Services
 Florida Public Service Commission
 2540 Shumard Oak Boulevard

**Re: Complaint by BellSouth Telecommunication, Inc., Regarding the
 Operation of a Telecommunication Company by Miami-Dade County
 in Violation of Florida Statutes and Commission Rules**

(Docket No. 050257)

Dear Mrs. Bayó:

Enclosed is an original Miami-Dade County's Secodn Response to Staff's First Request for Production.

Copies have been served via mailed Federal Expressed to the parties shown on the attached Certificate of Service.

cc: All Parties of Record
 David Stephen Hope
 Cynji Lee

CMP _____

COM _____

CTR _____

ECR _____

GCL *Responses Forwarded*

OPC _____

RCA _____

SCR _____

SGA _____

SEC 1

OTH _____

DOCUMENT NUMBER-DATE

09209 OCT-5 06

FPSC-COMMISSION CLERK

10/5/2006

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 SECOND RESPONSE
TO STAFF'S FIRST REQUEST FOR PRODUCTION**

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

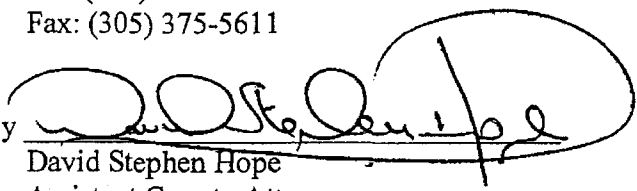
1. Regarding Request No. 3, said additional answer is produced for inspection and copying, pursuant to the Request and bates stamped MDC_PSC(3) 000001 through MDC_PSC(3) 000010.

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 *5th* day of October 2006, to:

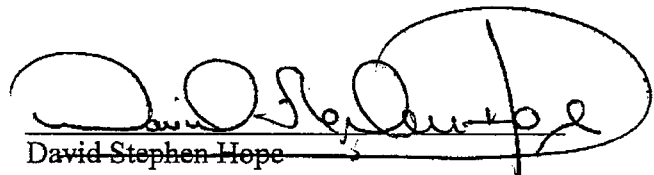
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Tallahassee, Florida, 32301

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



Vendor=BellSouth - Client=LUX - IPN=VA - EDI=2504946 - E

Master Acct No Billing Acct No Invoice Date Start Date End Date Due Date Invoice Type Transaction Type

305W055452833 305W055452833 05/06/2006 05/05/2006 06/04/2006 06/04/2006 Embedded Summary Debit Invoice

Addresses	Name	Address 1	Address 2	City	State	Zip Code
Remittance	BELLSOUTH TELECOMMUNICATIONS	PO BOX 33009		CHARLOTTE	NC	282430001
Bill To	SUNGLASS HUT OF					

Current Total Charges

2537.88

Amount	Qualifier	Charge Type	Date	Service Provider
-2592.79	Total payment amount	Current Month	05/05/2006	
2602.79	Billed Amount	Previous Month		
2537.88	Total Amount Due	Current Month		

Amount	Account	Name	Vendor Code
2328.86	305W055462	BELLSOUTH TELECOMMUNICATIONS	0A11

Contact Type Contact Info

Bill Inquiry Contact TE 18009488600
 Order Contact TE 18007537289

Add Amount	Tax/Surcharge	Description	Relationship
*	26.66 911-County Tax	DADE	Add
*	3.38 911-County Tax	MONROE	Add
*	7.95 Telecommunications Device for the Deaf (TDD) Servic		Add
*	0.24 Federal Tax		Add

Total Tax

34.57

Amount Account No Embedded Summary

50.00 305W055452 Lead Account

Amount: Cb's Rate DA Type

1.03 3	1.03 Local
Total Calls	Rate
3.09 3	1.03

Amount Account No Embedded Summary

69.47 3057409760 Sub-Account

Add Amount	Tax/Surcharge	Description	Relationship
*	2.00 Federal Tax		Add
*	3.97 Telecommunications Tax	FL - STATE COMMUNICA	Add
*	3.97 Telecommunications Tax	FL - LOCAL COMM TAX	Add
Total Tax			
12.43			

Add Amount	Service Category	Charge Type
*	55.94 Monthly Service Charge	Recurring Charge

Amount: Circuit/WTN

52.00 3057409376
32.00 3057409760

Add Amount	Service Category	Charge Type
*	0.18 Other Charges and Credits/Additions and Changes	Other Charges

Amount: Circuit/WTN Effective Date

0.18 N/A MANHOLE 06/05/2008

OCC Code

Addition, change or deletion related to monthly recurring events

Amount: Circuit/WTN Start Date End Date Service Description

0.00 3057409376
0.00 3057409760

Add Amount	Service Category	Charge Type
*	0.00 Interced Calls	Usage

Amount: Circuit/WTN

0.00 3057409760
Calls DA Type

2 Local
1 411

32.99 3058711782
32.99 3058714494

Add Amount Service Category Charge Type

* 3.31 Directory Assistance Usage

Amount Circuit/WTN

3.31 3057409782

Amount Call Rate DA Type

1.03 2 1.00 Local
2001.25 1 1.25 411

Total Call Rate

Addition, change or deletion related to monthly recurring events

3.31 3 2.00

Amount Circuit/WTN Start Date End Date

Amount Account No Embedded Summary

79.02 3058711782 Sub-Account

Add Amount Tax/Charge Description Relationship

* 2.37 Federal Tax Add
* 7.81 Telecommunications Tax FL - STATE COMMUNICA Add
* 4.50 Telecommunications Tax FL - LOCAL COMM TAX Add

Total Tax

14.05

Add Amount Service Category Charge Type

* 65.96 Monthly Service Charge Recurring Charge

Amount Circuit/WTN

32.99 3058711782

32.99 3058714494

Add Amount Service Category Charge Type

* 0.18 Other Charges and Credits/Additions and Changes Other Charges

Amount Circuit/WTN Effective Date

0.18 VIA MAMMOLE 06/05/2008

CCC Code

Addition, change or deletion related to monthly recurring events

Amount Circuit/WTN Start Date End Date Service Description

0.09 3058711782

0.09 3058714494

Add Amount Service Category Charge Type

* 10.80 Rerated Calls Usage

Amount Circ/WTN

2.7C 3058711782

Add Amount Tax/Charge Relationship

0.24 Federal Tax Information Only
 0.72 Telecommunications Tax Information Only
 0.45 Telecommunications Tax Information Only
 Calls DA Type

1 Local
 Amount Message Type Description Service Category

8.10 Sent Paid / DDD N/A
 Amount Call Date To City ST Duration To No Rate Period Call Type

0.90 Apr 6 2006 6:22PM CALL RETRN .0000000000 Day
 0.90 Apr 8 2006 6:18PM CALL RETRN 0.0000000000 Day
 0.90 Apr 10 2006 12:42PM CALL RETRN .0000000000 Day
 0.90 Apr 13 2006 2:18PM CALL RETRN .0000000000 Day
 0.90 Apr 21 2006 9:35AM CALL RETRN .0000000000 Day
 0.90 Apr 25 2006 9:02AM CALL RETRN 0.0000000000 Day
 0.90 Apr 26 2006 11:40AM CALL RETRN .0000000000 Day
 0.90 May 1 2006 4:26PM CALL RETRN .0000000000 Day
 0.90 May 3 2006 7:59AM CALL RETRN .0000000000 Day

Amount Calls Minutes

8.10 9 0
 Amount Circ/WTN

2.7C 3058714454

Add Amount Tax/Charge Relationship

0.08 Federal Tax Information Only
 0.24 Telecommunications Tax Information Only
 3.15 Telecommunications Tax Information Only
 Calls DA Type

1 Local
 Amount Message Type Description Service Category

2.70 Sent Paid / DDD N/A
 Amount Call Date To City ST Duration To No Rate Period Call Type

0.90 Apr 9 2006 4:55PM CALL RETRN .0000000000 Day
 0.90 Apr 21 2006 8:42PM CALL RETRN .0000000000 Day
 0.90 May 1 2006 2:28PM CALL RETRN .0000000000 Day

Amount Calls Minutes

2.7C 3 0

Add Amount Service Category Charge Type

* 2.08 Directory Assistance Usage

Amount: Circuit/WTN

1.03 3058711782
 Amount Calls Rate DA Type

1.03 1 1.03 Local
 Total Calls Rate

1.03 1 1.03
 Amount Circuit/WTN

1.03 3058714494
 Amount Calls Rate DA Type

1.03 1 1.03 Local
 Total Calls Rate

1.03 1 1.03

Amount Account No Embedded Summary

66.18 3058312676 Sub-Account

Add Amount	Tax/Charge	Description	Relationship
*	1.99 Federal Tax		Add
*	6.06 Telecommunications Tax	FL - STATE COMMUNICA	Add
*	5.77 Telecommunications Tax	FL - LOCAL COMM TAX	Add
Total Tax			
17.82			

Add Amount Service Category Charge Type

* 63.98 Monthly Service Charge Recurring Charge

Amount Circuit/WTN

32.99 3058312676
 32.99 3058316384

Add Amount Service Category Charge Type

* 0.18 Other Charges and Credits/Additions and Changes Other Charges

Amount Circuit/WTN Effective Date

0.18 Misc WAMP-OLE 05/23/2006

CCC Code

Addition, change or deletion related to monthly recurring events

Amount Circuit/WTN Start Date End Date Service Description

0.09 3058312676
 0.09 3058316384

Amount Account No Embedded Summary

33.08 3059353222 Sub-Account

Add Amount	Tax/Surcharge	Description	Relationship
*	0.95 Federal Tax		Add
*	3.03 Telecommunications Tax	FL - STATE COMMUNICA	Add
*	1.89 Telecommunications Tax	FL - LOCAL COMM TAX	Add
Total Tax			
5.91			

Add Amount	Service Category	Charge Type
*	32.99 Monthly Service Charge	Recurring Charge

Amount Circuit/WTN

32.99 3059353222

Add Amount	Service Category	Charge Type
*	0.09 Other Charges and Credits/Additions and Changes	Other Charges

Amount Circuit/WTN Effective Date

0.09 N/A MANHOLE 05/05/2006

CCC Code

Addition, change or deletion related to monthly recurring events

Amount Circuit/WTN Start Date End Date Service Description

0.09 3059353222

Amount Account No Embedded Summary

87.19 7862768845 Sub-Account

Add Amount	Tax/Surcharge	Description	Relationship
*	2.02 Federal Tax		Add
*	6.16 Telecommunications Tax	FL - STATE COMMUNICA	Add
*	3.84 Telecommunications Tax	FL - LOCAL COMM TAX	Add
Total Tax			
12.01			

Add Amount	Service Category	Charge Type
*	85.88 Monthly Service Charge	Recurring Charge

Amount Circuit/WTN

32.99 7862768845

32.99 7862768845

Add Amount Service Category Charge Type

* 0.18 Other Charges and Credits/Additions and Changes Other Charges

Amount Circuit/WTN Effective Date

0.18 MA MANHOLE 05/05/2005
OCC Code

Addition, charge or deletion related to monthly recurring events
Amount Circuit/WTN Start Date End Date Service Description

0.09 7862768845
0.09 7862768845

Add Amount Service Category Charge Type

* 0.00 Limited Calls Usage

Amount Circuit/WTN

0.00 7862768845
Calls DA Type

1 Local

Add Amount Service Category Charge Type

* 1.03 Directory Assistance Usage

Amount Circuit/WTN

1.03 7862768845
Amount Calls Rate DA Type

1.03 1 1.03 Local
Total Calls Rate

1.03 1 1.03

Amount Account Name - 3rd Party Vendor Code

70.67 305W055462 ENHANCED SERVICES BILLING,INC. 0078

Contact Type Contact Info

Bill Inquiry Contact TE 15882935724
Order Contact TE 18662933724

Amount Account No Embedded Summary - 3rd Party Charges

29.95 3054388833 Sub-Account

Add Amount	Tax/Surcharge	Description	Relationship
*	3.90	Federal Tax	Add
*	2.75	Telecommunications Tax	FL - STATE COMMUNICA Add
*	1.71	Telecommunications Tax	FL - LOCAL COMM TAX Add
Total Tax			
5.36			

Add Amount Service Category Charge Type

* 29.95 Normalized Calls Usage

Amount Circuit/W/T/N

29.95 3054362853

Add Amount Tax/Surcharge Relationship

0.90 Federal Tax Information Only

2.75 Telecommunications Tax Information Only

1.71 Telecommunications Tax Information Only

Amount Call Date To City ST Duration To No Rate Period Call Type

29.95 Apr 6 2006 12:00AM ACCESS INET SO- MON FEE .0000000000 Day

Amount Calls Minutes

29.95 1 .0

Amount Account No Embedded Summary - 3rd Party Charges

29.99 3058711782 Sub-Account

Add Amount Tax/Surcharge Description Relationship

* 0.90 Federal Tax Add

* 2.75 Telecommunications Tax FL - STATE COMMUNICA Add

* 1.72 Telecommunications Tax FL - LOCAL COMM TAX Add

Total Tax

5.37

Add Amount Service Category Charge Type

* 29.99 Normalized Calls Usage

Amount Circuit/W/T/N

29.99 3058711782

Add Amount Tax/Surcharge Relationship

0.90 Federal Tax Information Only

2.75 Telecommunications Tax Information Only

1.72 Telecommunications Tax Information Only

Amount Call Date To City ST Duration To No Rate Period Call Type

29.99 Apr 24 2006 12:00AM INTERNET ACCESS MO FEE .0000000000 Day

Amount Calls Minutes

29.99 1 .0

Amount	Account	Name - 3rd Party	Vendor Code
86.63	305W055452	MCI WORLD COM	022B
Contact Type Contact Info			
Bill Inquiry Contact TE 18004442222			
Order Contact TE 18004442222			
Add Amount	Tax/Surcharge	Description	Relationship
*	1.34	Federal Tax	Add
*	5.22	State/Provincial Tax	Add
*	7.25	Franchise Tax	Add
Total Tax			
13.84			

Add Amount	Service Category	Charge Type
*	38.59	Other Charges and Credits/Additions and Changes Other Charges

Add Amount	Service Category	Charge Type
*	14.23	Itemized Calls Usage

Amount	Account	Name - 3rd Party	Vendor Code
78.68	305W055452	ILD TELESERVICES, INC.	0782
Contact Type Contact Info			
Bill Inquiry Contact TE 18004334518			
Order Contact TE 18004334518			

Amount	Account No	Embedded Summary - 3rd Party Charges	
29.55	3052948210	Sub-Account	
Add Amount	Tax/Surcharge	Description	Relationship
*	0.90	Federal Tax	Add
*	2.78	Telecommunications Tax FL - STATE COMMUNICA	Add
*	1.77	Telecommunications Tax FL - LOCAL COMM TAX	Add
Total Tax			
5.42			

Add Amount	Service Category	Charge Type
*	29.95	Itemized Calls Usage

Amount Circuit/WTN

29.95 3052943210		Relationship	
Add Amount	Tax/Surcharge		
0.90	Federal Tax	Information Only	
2.75	Telecommunications Tax	Information Only	
1.77	Telecommunications Tax	Information Only	
Amount	Call Date	To City	ST Duration To No Rate Period Call Type
29.95	Apr 13 2006	1:06AM WEB HOSTING MO SVC FEE	.0000000000 Day
Amount	Calls	Minutes	
29.95	1	.9	

Amount Account No Embedded Summary - 3rd Party Charges

29.95 3055023942		Sub-Account	
Add Amount	Tax/Surcharge	Description	Relationship
0.90	Federal Tax		Add
2.75	Telecommunications Tax	FL - STATE COMMUNICA	Add
1.77	Telecommunications Tax	FL - LOCAL COMM TAX	Add
Total Tax			
5.36			

Add Amount Service Category Charge Type

29.95 Itemized Calls Usage

Amount Circuit/WTN

29.95 3055923942		Relationship	
Add Amount	Tax/Surcharge		
0.90	Federal Tax	Information Only	
2.75	Telecommunications Tax	Information Only	
1.77	Telecommunications Tax	Information Only	
Amount	Call Date	To City	ST Duration To No Rate Period Call Type
29.95	Apr 13 2006	1:10AM WEB HOSTING MO SVC FEE	.0000000000 Day
Amount	Calls	Minutes	
29.95	1	.0	