James Meza III General Counsel - Florida

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5558

October 13, 2006

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

Re: <u>Docket No. 050257-TL</u>: Complaint by BellSouth
Telecommunications, Inc., Regarding the Operation of a
Telecommunications Company by Miami-Dade County in Violation of
Florida Statutes and Commission Rules

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Second Re-Notice of Taking Deposition of Miami-Dade County Corporate Representatives' on November 3, 2006 @ 9:30 a.m., which we ask that you file in the captioned docket.

Copies of the Notice were served to the parties shown on the attached Certificate of Service on October 12, 2006.

Sincerely,

cc: All Parties of Record Jerry D. Hendrix E. Earl Edenfield, Jr.

CERTIFICATE OF SERVICE Docket No. 050257-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and First Class U. S. Mail this 13th day of October, 2006 to the

following:

Adam Teitzman
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ateitzma@psc.state.fl.us

Murray A. Greenberg Miami-Dade County Attorney David Stephen Hope, Esq. Cynji Lee. Esq. **Assistant County Attorneys** Miami-Dade County Attorney's Office **Aviation Division** U.S. Mail Address P.O. Box 592075 AMF Miami, Florida 33159-2075 Miami International Airport **Terminal Building** Concourse A, 4th Floor Miami, FL 33122 Tel. No. (305) 876-7040 Fax No. (305) 876-7294 dhope@miami-airport.com

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sturner@broadandcassel.com
dmiller@broadandcassel.com



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth Tele- Communications, Inc. Regarding The Operation of a Telecommunications Company by Miami-Dade County in))) DOCKET NO. 050257-TL)
Violation of Florida Statutes and)
Commission Rules)

SECOND RE-NOTICE OF TAKING DEPOSITION

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

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

Murray A. Greenberg, Esq.
Miami-Dade County Attorney
David Stephen Hope, Esq.
Assistant County Attorney
Miami-Dade County
Attorney's Office
Aviation Division
P.O. Box 592075 AMF
Miami, Florida 33159-2075

PLEASE TAKE NOTICE that the undersigned attorney will take the deposition of Miami-Dade County's designated Person or Persons With the Most Knowledge of the following:

- (1) the information contained in the Affidavit of Mark Forare submitted by Miami-Dade County in support of its Motion to Dismiss (which affiant Miami-Dade County has advised has retired and is no longer employed by Miami-Dade County);
- (2) the role, if any, of Miami-Dade County in the provision of telecommunications services to airport security; and
- (3) the role, if any, of the provision of telecommunications services in the safe and efficient transportation of passengers and freight through the airport facility at Miami International Airport.

on **Friday, November 3, 2006 at 9:30 a.m.** at the offices of Lash & Goldberg, LLP, Bank of America Tower, Suite 1200, 100 Southeast 2nd Street, Miami, Florida 33131. The oral examination will continue from day to day until completed. This deposition is being taken for the purposes of discovery or for such other purposes as are permitted under the rules

of the Florida Public Service Commission.

Respectfully submitted:

BELLSOUTH TELECOMMUNICATIONS, INC.

James Meza, Esq.
Sharon R. Liebman, Esq.
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301
(305) 347-5558

E. Earl Edenfield, Jr. 675 West Peachtree Street, N.E. Suite 4300

Atlanta, Georgia 30375 (404) 335-0763

Martin B. Goldberg, Esq.
LASH & GOLDBERG LLP
Bank of America Tower, Suite 1200
100 Southeast Second Street
Miami, Florida 33131
(305) 347-4040

cc: Kresse & Associates Court Reporters

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was faxed and

mailed this 17 day of October 2006, to:

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

Jean L. Kiddoo, Esq.
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Miami-Dade County Attorney
David Stephen Hope, Esq.
Assistant County Attorney
Miami-Dade County Attorney's Office
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MARTIN B. GOLDBERG