

Matilda Sanders

From: Fatool, Vicki [Vicki.Fatool@BellSouth.COM]
Sent: Friday, October 13, 2006 3:10 PM
To: Filings@psc.state.fl.us
Subject: 050257-TP BellSouth's Second Re-Notice of Taking Deposition of Miami-Dade County's Corporate Representative
Importance: High
Attachments: 050257.pdf

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ECR _____
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RCA _____
SCR _____
SGA _____
SEC /
OTH _____

A. Vicki Fatool
Legal Secretary to James Meza III
BellSouth Telecommunications, Inc.
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5560
vicki.fatool@bellsouth.com

B. Docket No. 050257-TP

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

C. BellSouth Telecommunications, Inc.
on behalf of James Meza III

D. 5 pages total (includes letter, certificate of service and pleading)

E. BellSouth Telecommunications, Inc.'s *Second* Re-Notice of Taking Deposition of Miami-Dade County's Corporate Representative

pdf

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DOCUMENT NUMBER-DATE
09524 OCT 13 08
FPSC-COMMISSION CLERK

James Meza III
General Counsel - Florida

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

ORIGINAL

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: Docket No. 050257-TL: 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,



James Meza III

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

DOCUMENT NUMBER - DATE

09524 OCT 13 06

FPSC-COMMISSION CLERK

**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

Jean L. Kiddoo
Danielle C. Burt
Bingham McCutchen
3000 K Street, N.W., Ste. 300
Washington, D.C. 20007
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jlkiddoo@swidlaw.com
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M. Stephen Turner, P.A.
David K. Miller, P.A.
Broad and Cassel
215 South Monroe Street
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Tel. No. (850) 681-6810
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sturner@broadandcassel.com
dmiller@broadandcassel.com


James M. Lee III

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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

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

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

DOCUMENT NUMBER-DATE

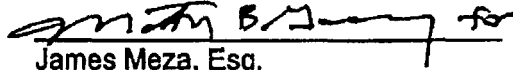
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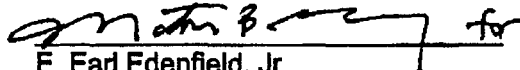
of the Florida Public Service Commission.

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
Aviation Division
P.O. Box 592075 AMF
Miami, Florida 33159-2075


MARTIN B. GOLDBERG