

Ruth Nettles

080631-TP

From: WOODS, VICKIE (Legal) [vf1979@att.com]
Sent: Wednesday, January 06, 2010 3:33 PM
To: Filings@psc.state.fl.us
Subject: 080631-TP AT&T Florida's Motion to Compel
Attachments: Document.pdf

- A. Vickie Woods
BellSouth Telecommunications, Inc. d/b/a AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5560
vf1979@att.com
- B. Re: Docket No. 080631-TP: Petition for Commission to intervene, investigate and mediate dispute between DSL Internet Corporation d/b/a DSLi and BellSouth Telecommunications, Inc.
- C. BellSouth Telecommunications, Inc. d/b/a AT&T Florida

on behalf of Manuel A. Gurdian
- D. 4 pages total (includes letter, certificate of service and pleading)
- E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Motion to Compel

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1/6/2010



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January 6, 2010

Ms. Ann Cole
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

**Re: Docket No. 080631-TP: Petition for Commission to intervene,
investigate and mediate dispute between DSL Internet Corporation d/b/a
DSLi and BellSouth Telecommunications, Inc.**

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Motion to Compel, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Manuel A. Gurdian

cc: All parties of record
Gregory R. Follensbee
Jerry D. Hendrix
E. Earl Edenfield, Jr.

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00131 JAN-6 09

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CERTIFICATE OF SERVICE
Docket No. 080631-TP

I HEREBY CERTIFY that a true and correct copy was served via Electronic Mail
and First Class U. S. Mail this 6th day of January, 2010 to the following:

Florida Public Service Commission
Charles Murphy, Staff Counsel
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
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Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for Commission to intervene,) Docket No. 080631-TP
investigate and mediate dispute between)
DSL Internet Corporation d/b/a DSLI and)
BellSouth Telecommunications, Inc.)
_____) Filed: January 6, 2010

AT&T FLORIDA'S MOTION TO COMPEL

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida") submits this Motion to Compel DSL Internet Corporation d/b/a DSLI ("DSL") to provide the documents referenced in DSL's Response to AT&T Florida's First Request for Production of Documents. For the following reasons, the Florida Public Service Commission ("Commission") should compel DSL to provide the requested documents.

1. On or about October 12, 2009, DSL filed its Response to AT&T Florida's First Request for Production. In its Response to AT&T Florida's First Request for Production, DSL indicated that it would make available copies of the documents which were responsive to AT&T Florida's First Request for Production.

2. On December 7, 2009, undersigned counsel's office spoke with DSL's counsel and requested copies of the documents identified in DSL's responses to AT&T Florida's First Request for Production of Documents with the exception of the parties' Interconnection Agreements. On the same date, undersigned counsel's office also sent a follow-up email correspondence to DSL's counsel confirming the telephone conversation and requesting that the documents be sent to AT&T Florida by December 14, 2009.

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3. On December 16, 2009, undersigned counsel's office contacted DSLI's counsel's office and requested the status of providing the requested documents to AT&T Florida.

4. On December 30, 2009, undersigned counsel's office contacted DSLI's counsel and again requested the status of providing the requested documents to AT&T Florida.

5. To date, despite repeated requests, DSLI has failed to provide the requested documents.

6. AT&T Florida is in need of the information requested in the above-referenced discovery to properly prepare its case for hearing and respectfully requests that the Commission grant its Motion to Compel.

WHEREFORE, for the foregoing reasons, AT&T Florida respectfully requests that the Commission grant its Motion to Compel.

Respectfully submitted this 6th day of January, 2010.

AT&T FLORIDA



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