

SUZANNE FANNON SUMMERLIN  
ATTORNEY AT LAW

ORIGINAL

1311-B Paul Russell Road, Suite 201  
Tallahassee, Florida 32301

TELEPHONE (850) 656-2288  
TELECOPIER (850) 656-5589

August 9, 2001

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

RECEIVED-FPSC  
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COMMISSION  
CLERK

RE: Docket No. 010740-TP (Complaint of IDS Against BellSouth)

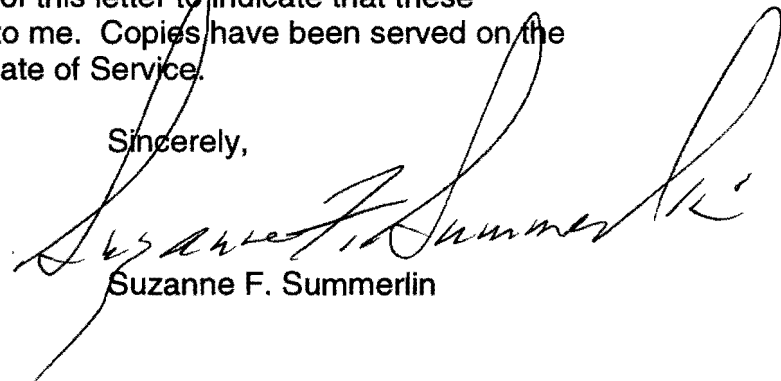
Dear Ms. Bayo:

Enclosed please find an original and fifteen copies of the following documents for filing in the above-referenced docket:

1. IDS Telcom, LLC's Emergency Motion Requesting Prehearing Officer to Issue Request to the Circuit Court of Jefferson County, Alabama, to Issue Out-of-State Subpoenas 09716-01
2. IDS Telcom, LLC's Emergency Motion Requesting Prehearing Officer to Issue Request to the Circuit Court of Fulton County, Georgia, to Issue Out-of-State Subpoenas 09717-01
3. IDS Telcom, LLC's Notice of Depositions (Birmingham, Alabama) 09718-01
4. IDS Telcom, LLC's Notice of Depositions (Atlanta, Georgia) 09719-01

Please stamp the enclosed copy of this letter to indicate that these originals were filed and return the copy to me. Copies have been served on the parties reflected on the attached Certificate of Service.

Sincerely,



Suzanne F. Summerlin

SFS/ms

cc: Parties of Record  
Mr. Keith Kramer

DOCUMENT NO. DATE  
09714-01 8/10/01  
FPSC - COMMISSION CLERK

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of IDS Long Distance, Inc. )  
n/k/a IDS Telcom, L.L.C., Against )  
BellSouth Telecommunications, Inc., and )  
Request for Emergency Relief. )  
\_\_\_\_\_ )

Docket No. 010740-TP  
Filed August 9, 2001

**IDS TELCOM, L.L.C.'s EMERGENCY MOTION REQUESTING  
PREHEARING OFFICER TO ISSUE REQUEST TO THE CIRCUIT COURT  
OF JEFFERSON COUNTY, ALABAMA, TO ISSUE OUT-OF-STATE  
SUBPOENAS**

IDS TELCOM, L.L.C., ("IDS") hereby files its Emergency Motion  
Requesting Prehearing Officer to Issue Request to the Circuit Court of Jefferson  
County, Alabama, to Issue Out-of-State Subpoenas, and as grounds therefore,  
states:

1. Depositions are scheduled for August 15, 16, 17, 2001 in  
Birmingham, Alabama. The individuals are as follows:

- 1) Debbie M. Williams, Specialist August 15, 2001 - 8:30a.m.  
Customer Billing Services  
600 N. 19th Street, 24th Floor  
Birmingham, Alabama 35203
- 2) Susie H. Lavett, Director August 15, 2001 - 10:30a.m.  
3535 Colonnade Parkway, E3A  
Birmingham, Alabama 25243
- 3) Patti N. Knight, Account Mgr August 15, 2001 - 2:30p.m.  
Interconnection Operations  
600 N. 19th Street, 20th Floor  
Birmingham, Alabama 35203
- 4) Pat A. Rand, Manager August 15, 2001 - 4:30p.m.  
Interconnection Sales  
600 N. 19th Street, 9th Floor

DOCUMENT NUMBER-DATE

09716 AUG 10 2001

FPSC-COMMISSION CLERK

Birmingham, Alabama 35203

- 5) Petra Pryor, Director August 16, 2001 - 8:30a.m.  
Interconnection Sales  
600 N. 19th Street, 10th Floor  
Birmingham, Alabama
- 6) Claude P. Morton, Manager August 16, 2001 - 10:30a.m.  
Interconnection Operations  
3535 Colonnade Parkway, Room S611  
Birmingham, Alabama
- 7) Michael J. Lepkowski, Acct Exc August 16, 2001 - 2:30p.m.  
Interconnection Sales  
600 N. 19th Street, 10th Floor  
Birmingham, Alabama
- 8) W.F. Thrasher, Jr., Director August 16, 2001 - 4:30p.m.  
Interconnection Operations  
600 N. 19th Street, 14th Floor  
Birmingham, Alabama
- 9) Sandra Harris, Contractor August 17, 2001 - 8:30a.m.  
Operations Support Services  
1876 Data Drive  
Hoover, Alabama
- 10) Wheeler D. Stewart, Contractor August 17, 2001 - 10:30a.m.  
3535 Colonnade Parkway, Suite W6D  
Birmingham, Alabama

2. In order for IDS to properly serve the deposition subpoenas on the above-noted individuals, the State of Alabama, by and through the Jefferson County Circuit Court in Birmingham, Alabama, will require an order from the Florida Public Service Commission requesting the Jefferson County Circuit Court to issue these subpoenas.

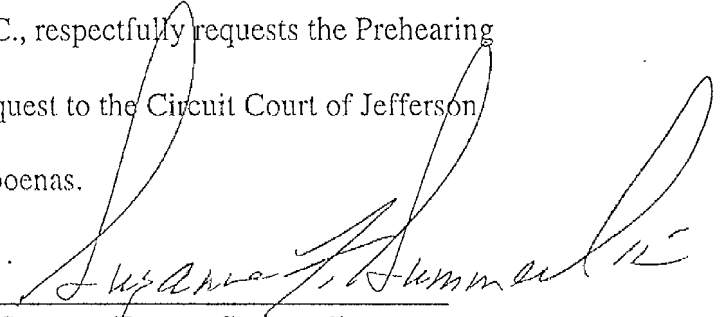
3. As the Prehearing Officer has been designated by the Chairman of the Commission and empowered by Rule 25-22.038, Florida Administrative

attached request of the Jefferson County Circuit Court to issue the above-referenced deposition subpoenas.

4. IDS respectfully requests immediate disposition of this matter as the depositions are scheduled for August 15, 16, 17, 2001.

WHEREFORE, IDS TELCOM, L.L.C., respectfully requests the Prehearing Officer to immediately issue the attached Request to the Circuit Court of Jefferson County, Alabama, to Issue Out-of-State Subpoenas.

DATED this 9<sup>th</sup> day of August, 2001.

  
Suzanne Fannon Summerlin  
1311-B Paul Russell Road, Suite 201  
Tallahassee, Florida 32301  
(850) 656-2288  
Attorney for IDS Telecom, L.L.C.

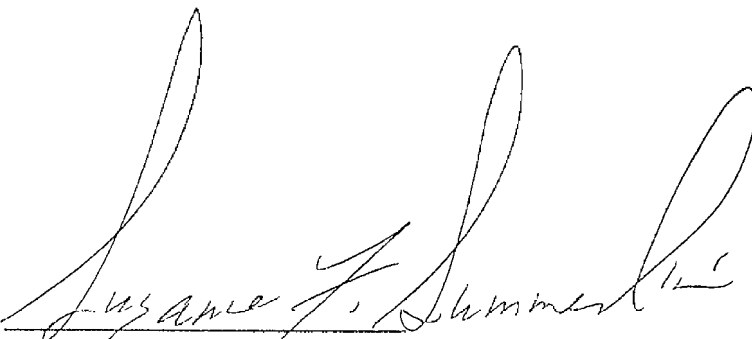
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing by Facsimile and U.S. Mail this 9<sup>th</sup> day of August, 2001, to:

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

Nancy B. White, Esq.  
James Meza III  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301

Charles Beck, Esq.  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, #812  
Tallahassee, FL 32399-1400

  
Suzanne F. Summerlin



- 4) Pat A. Rand, Manager August 15, 2001 - 4:30p.m.  
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1876 Data Drive  
Hoover, Alabama
- 10) Wheeler D. Stewart, Contractor August 17, 2001 - 10:30a.m.  
3535 Colonnade Parkway, Suite W6D  
Birmingham, Alabama

to appear at the date and time stated therein.

DONE AND ORDERED, this the \_\_\_\_\_ day of August, 2001.

\_\_\_\_\_  
J. TERRY DEASON, Commissioner and  
Prehearing Officer