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May 7, 2003

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

**RE: DOCKET No. 030200-TP
SUPRA'S ANSWER TO AT&T'S EMERGENCY
PETITION REQUESTING A CEASE AND DESIST ORDER AND
OTHER SANCTIONS AND MEMORANDUM OF LAW**

Dear Mrs. Bayo:

Enclosed is the original and seven (7) copies of Supra Telecommunications and Information Systems, Inc.'s (Supra) Answer to AT&T'S Emergency Petition in the above captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return it to me.

Sincerely,

Jorge Cruz-Bustillo
Assistant General Counsel

DOCUMENT NUMBER: DATE
04141 MAY-7 8
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

Docket No. 030200-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Facsimile, Hand Delivery and/or U.S. Mail this 7th day of May, 2003 to the following:

Carris (Lee) Fordham , Esq.
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
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Ms. Lisa A. Riley
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SUPRA TELECOMMUNICATIONS
& INFORMATION SYSTEMS, INC.
2620 S.W. 27th Avenue
Miami, Florida 33133
Telephone: (305) 476-4252
Facsimile: (305) 443-9516

By: Jorge Cruz-Bustillo/jwA
JORGE CRUZ-BUSTILLO, ESQ.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Emergency petition of AT&T
Communications of the Southern States,
LLC d/b/a AT&T d/b/a Lucky Dog Phone
Co. d/b/a ACC Business d/b/a SmarTalk
d/b/a Unispeaksm Service d/b/a AT&T for
cease and desist order and other sanctions
against Supra Telecommunications and
Information Systems, Inc.

DOCKET NO. 030200-TP

FILED: May 7, 2003

SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC.S
ANSWER TO
AT&T'S EMERGENCY PETITION REQUESTING
A CEASE AND DESIST ORDER AND OTHER SANCTIONS
AND MEMORANDUM OF LAW

Supra Telecommunications and Information Systems, Inc., ("Supra"), by and through its undersigned counsel, hereby files this ANSWER and in support thereof:

1. Admit.
2. Admit.
3. Admit.
4. Admit.
5. Admit.
6. Admit.
7. Admit.
8. Admit.
9. Admit.
10. Admit.

11. Denied. Section 364.02(2), Florida Statutes, does not establish a safe haven or absolute immunity from suspension of service if the IXC refuses to pay lawful past due access charges. This policy was established in Order Nos. PSC-01-0824-FOF-TP and PSC-02-0413-FOF-TP.
12. Admit.
13. Admit.
14. Admit that Rule 25-4.118 was promulgated by the Commission. The rule speaks for itself.
15. Admit.
16. Denied. AT&T makes itself “unavailable” when it refuses to pay for lawful past due access charges.
17. Admit that AT&T was billed for access charges. Deny that the invoices had any defects. Supra provided AT&T 55 days in which to review the invoices. This was more than enough time to review the Customer Detail Records submitted to AT&T on December 20, 2002.
18. Admit that on January 8, 2003, Supra sent a letter to AT&T informing them of what actions Supra would take if AT&T continued to refuse to pay its bills. Admit that on January 22, 2003, Supra filed an adversarial proceeding before the Bankruptcy court. Admit that on January 29, 2003, 42 days after receiving the Customer Detailed Records requested by AT&T, Supra sent out courtesy letters to Supra’s own customers who also utilized AT&T for long distance to inform them of AT&T continued refusal to pay for lawful past due access charges. The remainder of the paragraph is denied.

19. Denied.
20. Denied.
21. Denied that Supra refused to allow any customer to switch to AT&T from another IXC after February 6, 2003. The remainder of the paragraph is denied.
22. Denied. The agreement speaks for itself.
23. Admit that AT&T sent to Supra a letter dated February 7, 2003. The contents of the letter speaks for itself.
24. Admit that Supra sent a written response dated February 11, 2003. The letter speaks for itself. The remainder of the paragraph is denied.
25. Without knowledge. Demand strict proof thereof.
26. Without knowledge. Demand strict proof thereof.
27. Denied. Without knowledge as to calls to AT&T. Demand strict proof thereof.
28. Denied.
29. Denied.
30. Denied.

RESPECTFULLY SUBMITTED this 7th day of May 2003.

SUPRA TELCOMMUNICATIONS &
INFORMATION SYSTEMS, INC.
2620 S.W. 27th Ave.
Miami, Florida 33133
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Facsimile: 305.443.9516

By: Jorge Cruz-Bustillo
Jorge L. Cruz-Bustillo,
Florida Bar No. 0976441