



Telephone: (850) 402-0510
Fax: (850) 402-0522
www.supratelecom.com

1311 Executive Center Drive, Suite 220
Tallahassee, FL 32301-5027

September 9, 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. 030349-TP -
SUPRA'S RESPONSE TO BELL SOUTH'S MOTION TO STRIKE**

Dear Mrs. Bayo:

Enclosed are the original and seven copies of Supra Telecommunications and Information Systems, Inc.'s (Supra) Response to BellSouth's Motion to Strike. Supra's Response was served on the parties on August 27th by e-mail (see E-Mail Notice), but Supra inadvertently did not file this Response until Staff Counsel called our attention to this. Please accept this Response and file in the 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
08519 SEP-98
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

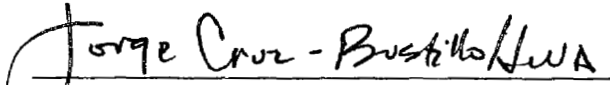
Docket No. 030349-TP

I HEREBY CERTIFY that a true and correct copy of the following was served via Hand Delivery, Facsimile, U.S. Mail, and/or Federal Express this 9th day of September 2003 to the following:

Linda H. Dodson, Esq.
Staff Counsel
Florida Public Service Commission
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
850/ 413-6199

Nancy B. White, Esq.
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301

SUPRA TELECOMMUNICATIONS
& INFORMATION SYSTEMS, INC.
2620 S. W. 27th Avenue
Miami, FL 33133
Telephone: 305/ 476-4252
Facsimile: 305/ 443-1078


By: Jorge Cruz-Bustillo

Shelfer, Ann

From: Cruz-Bustillo, Jorge
Sent: Wednesday, August 27, 2003 11:09 AM
To: 'Linda Dodson'
Cc: James Meza III (E-mail); Nancy Sims; Audu, Jonathan; Shelfer, Ann
Subject: Response to Motion to Strike & Motion to Publicly Disclose

Linda:

Attached, please find Supra's Response to BellSouth's Motion to Strike and Supra's Motion to Publicly Disclose all information related Operation Sunrise upon a finding that BellSouth has violated a Commission Order, Florida Statutes, and/or Federal Law. Our Tallahassee Office will file the hard copies by tomorrow.

Also, with respect to Supra's Motion to Compel. BellSouth has provided either documentation or satisfactory responses to all of Supra's requests **except Supra's RFP NO. 5**. The request is still outstanding.

I will note that BellSouth has promised and I am yet to receive the documentation regarding RFP NO. 4 and documentation regarding 64.2009.



08-27-03 Motion
Publicly Discl...



08-27-03 Response
to Mot Strik...

If you have any questions, please let me know.

Jorge L. Cruz-Bustillo
Supra Telecom
2620 SW 27th Ave.
Miami, FL 33133-3005
Tel. 305.476.4252
Fax 305.443.1078

The information contained in this transmission is legally privileged and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you receive this communication in error, please notify us immediately by telephone call to 305.476.4252 and delete the message. Thank you.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by Supra Telecommunications
and Information Systems, Inc. against BellSouth
Telecommunications, Inc. regarding BellSouth's
alleged use of carrier to carrier information.

DOCKET NO. 030349-TP
FILED: AUGUST 27, 2003

**SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC.'S
RESPONSE TO BELL SOUTH'S MOTION TO STRIKE**

Supra Telecommunications & Information Systems, Inc. ("Supra") by and through its undersigned counsel, hereby files this Response to Motion to Strike. In support of this Response, Supra states as follows:

1. At the Pre-hearing Conference, the parties agreed that BellSouth's Motion to Strike would be dismissed, without prejudice. Further that Supra would be permitted to file Supplemental Direct Testimony, limited to five (5) pages. This Supplemental Direct Testimony would identify which portions of Exhibit Nos. DAN-6, DAN-7 and DAN-8 would be relied upon by Supra during the evidentiary hearing.

2. BellSouth makes an incorrect assertion in paragraph 2, third sentence, of its Motion to Strike. The agreement between the parties was that for those portions of the exhibits not identified in the Supplemental Direct Testimony, those pages could not be used in its Direct examination. Any pages of Exhibit Nos. DAN-6, DAN-7 of DAN-8, could still be used and introduced into evidence in the case under cross-examination and/or impeachment purposes. Accordingly, it is incorrect for BellSouth to state that "those exhibits [not identified] would be excluded from the Nilson Testimony and would not be introduced into evidence at the hearing of this matter." (Emphasis added).

3. Page 1, lines 15-23 through Page 2, lines 1-14, are Supplemental Direct Testimony as stipulated to by the parties. The Direct Testimony is associated with DAN-6 Bate Stamped

000079 and 000144. BellSouth has not moved to strike either of these two exhibit pages. Accordingly, the Direct Testimony associated with these exhibits should also be considered appropriate and consistent with the parties's stipulation.

4. Supra does not oppose BellSouth's motion to strike Bate Nos. 798-840 of DAN-7, nor DAN-19.

WHEREFORE, Supra respectfully requests that this Commission deny BellSouth's Motion to Strike Page 1, lines 15-23 through Page 2, lines 1-14 of Nilson's Supplemental Direct Testimony. Supra does not oppose BellSouth's Motion with respect to Bate Nos. 798-840 of DAN-7, nor with respect to DAN-19.

CERTIFICATE OF SERVICE

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

Express this 27th day of August 2003 to the following:

Nancy B. White, Esq.
C/O Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street – Suite 400
Tallahassee, Florida 32301

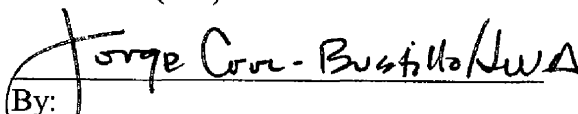
via Fed Ex and e-mail

Jim Meza, Esq.
Suite 4300, BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, GA 30375
(404) 335-0710

via Hand Delivery and e-mail

Linda Dodson
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

SUPRA TELECOMMUNICATIONS
& INFORMATION SYSTEMS, INC.
2620 S.W. 27th Avenue
Miami, Florida 33133
Telephone: (305) 476-4252
Facsimile: (305) 443-1078

By: 
Jorge Cruz-Bustillo