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July 14, 2004

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. 980119-TP -
SUPRA'S MOTION TO SHORTEN TIME TO PROVIDE
DISCOVERY RESPONSES, AND IN THE ALTERNATIVE
MOTION FOR CONTINUANCE**

Dear Mrs. Bayo:

Enclosed are the original and fifteen (15) copies of Supra Telecommunications and Information Systems, Inc.'s (Supra) Motion To Shorten Time To Provide Discovery Responses, And In The Alternative Motion For Continuance to be filed 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,



Steven Chaiken
Assistant General Counsel

DOCUMENT NUMBER-DATE

07658 JUL 14 8

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

Docket No. 980119-TP

I HEREBY CERTIFY that a true and correct copy of the following was served via E-mail, Hand Delivery, Facsimile, and/or U.S. Mail this 14th day of July 2004 to the following:

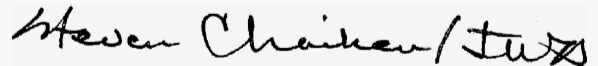
Patti Christensen

*Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850*

Nancy White/James Meza III

*BellSouth Telecommunications, Inc.
c/o Ms. Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556*

SUPRA TELECOMMUNICATIONS
AND INFORMATION SYSTEMS, INC.
2620 S. W. 27th Avenue
Miami, FL 33133
Telephone: 305/ 476-4239
Facsimile: 305/ 443-1078



By: Steven Chaiken

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications and)
Information Systems, Inc. against BellSouth)
Telecommunications, Inc. for violation of the)
Telecommunications Act of 1996; petition for)
resolution of disputes as to implementation and)
interpretation of interconnection, resale and)
collocation agreements; and petition for)
emergency relief.)
_____)

Docket No. 980119-TP

Filed: July 14, 2004

**SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S
MOTION TO SHORTEN TIME TO PROVIDE DISCOVERY RESPONSES, AND IN
THE ALTERNATIVE MOTION FOR CONTINUANCE**

NOW COMES, Supra Telecommunications and Information Systems, Inc. ("Supra"), pursuant to Florida Rules of Civil Procedure 1.340, 1.350, and 1.370, and requests that time BellSouth Telecommunications, Inc. ("BellSouth") is allowed in which to provide discovery responses be shortened, and in the alternative, pursuant to Rule 28-106.2 10, Florida Administrative Code, moves for a Continuance of the Hearing date in the above captioned matter. In support thereof Supra states:

1. On July 13, 2004, Supra served upon BellSouth the following (collectively referred to as the "Discovery"):
 - a. SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S FIRST REQUEST FOR ADMISSIONS (NOS. 1 - 11) TO BELLSOUTH TELECOMMUNICATIONS, INC.¹
 - b. SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S SECOND SET OF INTERROGATORIES (NOS. 23 - 48) TO BELLSOUTH TELECOMMUNICATIONS, INC.²
 - c. SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1 - 7) TO BELLSOUTH TELECOMMUNICATIONS, INC.³

¹ A copy of which is attached hereto as **Exhibit A**.

² A copy of which is attached hereto as **Exhibit B**.

³ A copy of which is attached hereto as **Exhibit C**.

2. The Discovery issued was primarily a result from information obtained at the deposition of BellSouth witness Ronald Pate conducted on July 7, 2004.
3. According to Florida Rules of Civil Procedure 1.340, 1.350, and 1.370, BellSouth must serve its responses to the Discovery within 30 days (or by August 12, 2004). Pursuant to these same rules, the Commission, however, “may allow a shorter or longer time.”
4. According to Order No. PSC-04-0120-PCO-TP, “all discovery shall be completed by July 28, 2004.”⁴ Also pursuant to this Order, the hearing in this docket is set for August 4, 2004.
5. On July 13, 2004, the same day on which Supra served the Discovery, Supra requested that BellSouth agree to provide its responses to the Discovery on an expedited basis (within 2 weeks). BellSouth did not agree to do so.
6. If the time BellSouth is allowed to respond to the Discovery is not shortened to July 28, 2004, Supra will be prejudiced. If BellSouth files its responses after the hearing in this matter, BellSouth’s responses will be of no value to Supra. Further, if BellSouth files its responses between July 28, 2004 and the hearing date, Supra will have insufficient time to review BellSouth’s responses and compel better or sufficient responses if necessary, prior to the hearing.
7. As BellSouth is aware of the issues raised in the Discovery, BellSouth will not be prejudiced should this Motion be granted.
8. Consequently, Supra respectfully requests that the Commission shorten the time in which BellSouth must provide its responses to the Discovery to July 28, 2004.

⁴ Id. at p. 2.

9. In the alternative, Supra respectfully requests that the Commission continue this entire matter and reschedule this hearing for sometime in or after September 2004.
10. The above captioned matter is scheduled for hearing on August 4, 2004. Pursuant to the Florida Rules of Civil Procedure BellSouth's Discovery responses are due on August 12, 2004, eight (8) days after the scheduled hearing for this matter.
11. Due to the proximity of the hearing date, Supra respectfully requests that the Commission act on this Motion in an expedited fashion and either shorten the time in which BellSouth's responses to the Discovery are due or continue this entire matter for sometime in September 2004. This motion will not prejudice either party.

WHEREFORE, Supra respectfully request that the Commission considers this Motion on an expedited basis and that the Commission shorten the time in which BellSouth must respond to the Discovery to on or before July 28, 2004 or continue this entire matter.

Respectfully submitted this 14th day of July 2004.

SUPRA TELECOMMUNICATIONS AND
INFORMATION SYSTEMS, INC.



Steven B. Chaiken
2620 S.W. 27th Avenue
Miami, Florida 33133
Telephone: 305.476.4239
Facsimile: 305.443.1078

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications and Information Systems, Inc. against BellSouth Telecommunications, Inc. for violation of the Telecommunications Act of 1996; petition for resolution of disputes as to implementation and interpretation of interconnection, resale and collocation agreements; and petition for emergency relief.

DOCKET NO. 980119-TP

FILED: JULY 13, 2004

SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S
FIRST REQUEST FOR ADMISSIONS (NOS. 1 - 11)
TO BELL SOUTH TELECOMMUNICATIONS, INC.


ADMISSIONS

- 1) Please admit that the only ordering systems/interfaces contemplated by the parties' agreement(s) which served as the basis for the FPSC's July 22, 1998 ruling in Order No. PSC-98-1001-FOF-TP, as clarified by the FPSC's rulings in Order Nos. PSC-98-1467-FOF-TP and PSC-00-0288-PCO-TP, were LENS and EDI.
- 2) Please admit that the only ordering systems/interfaces contemplated by the parties' Resale Interconnection and Unbundling Agreement between Supra and BellSouth filed November 24, 1997 in Docket No. 971555-TP were LENS and EDI.
- 3) Please admit that the only ordering systems/interfaces contemplated by the parties' Interconnection Agreement dated October 5, 1999 were LENS and EDI.
- 4) Please admit that the only ordering systems/interfaces contemplated by the parties' Interconnection Agreement dated July 15, 2002 were LENS, EDI and TAG.
- 5) Please admit that in Docket No. 980119-TP, the FPSC never ordered BellSouth to make any modifications to TAG.
- 6) Please admit that in Docket No. 980119-TP, the FPSC ordered BellSouth to make modifications to EDI and/or LENS.
- 7) Please admit that subsequent to July 22, 1998, BellSouth made no modifications to LENS so that LENS provided the same online edit checking capability to Supra that BellSouth's retail ordering systems provide.
- 8) Please admit that subsequent to July 22, 1998, BellSouth made no modifications to EDI so that EDI provided the same online edit checking capability to Supra that BellSouth's retail ordering systems provide.

- 9) Please admit that the KPMG Florida Third Party Test made no specific findings relating to on-line edit checking.
- 10) Please admit that BellSouth provided no instructions to KPMG related specifically to the issue of on-line edit checking.
- 11) Please admit that in the Florida Third Party Test, KPMG did not conduct any tests related to on-line edits prior to submission of a service order or local service request.

Respectfully submitted this 13th day of July 2004.

SUPRA TELECOMMUNICATIONS
AND INFORMATION SYSTEMS, INC.
2620 S.W. 27th Avenue
Miami, Florida 33133
Telephone: 305.476.4239
Facsimile: 305.443.1078

By: 

STEVEN B. CHAIKEN

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications and Information Systems, Inc. against BellSouth Telecommunications, Inc. for violation of the Telecommunications Act of 1996; petition for resolution of disputes as to implementation and interpretation of interconnection, resale and collocation agreements; and petition for emergency relief.

DOCKET NO. 980119-TP

FILED: JULY 13, 2004

SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S
SECOND SET OF INTERROGATORIES (NOS. 23 - 48) TO
BELLSOUTH TELECOMMUNICATIONS, INC.

Pursuant to Rule 1.340, Florida Rules of Civil Procedure, Supra Telecommunications and Information Systems, Inc. ("Supra"), by and through its undersigned counsel, hereby serves its Second Set of Interrogatories to BellSouth Telecommunications Inc. ("BellSouth"). These interrogatories shall be answered under oath by you or through your agent who is qualified to answer and who shall be fully identified, with said answers being served as provided pursuant to the Rules of Civil Procedure and within the time period set out in Order No. PSC-04-0120-PCO-TP, which states that all discovery shall be completed by July 28, 2004.

DEFINITIONS

"You", "your", "Company" or "BellSouth" refers to BellSouth Telecommunications, Inc., its employees and authorized agents.

"Document" refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

"Identify" means:

(a) With respect to a person, to state the person's name, address and business relationship (e.g., "employee") to the Company;

(b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

"Act" refers to the Communications Act of 1934 as amended by the Telecommunications Act of 1996.

INTERROGATORIES

Interrogatory 23. Please identify the agreement(s) which served as the basis for the FPSC's July 22, 1998 ruling in Order No. PSC-98-1001-FOF-TP as clarified by the FPSC's rulings in Order Nos. PSC-98-1467-FOF-TP and PSC-00-0288-PCO-TP.

Interrogatory 24. Please specifically identify any and all CLEC ordering interfaces contemplated by the agreement(s) identified in response to Interrogatory Number 23. In so doing, please provide any and all cites to the agreement(s) where such interfaces are mentioned or otherwise discussed.

Interrogatory 25. Please specifically identify any and all CLEC ordering interfaces contemplated by the parties in the Resale Interconnection and Unbundling Agreement between Supra and BellSouth filed November 24, 1997 in Docket No. 971555-TP. In so doing, please provide any and all cites to the agreement where such interfaces are mentioned or otherwise discussed.

Interrogatory 26. Please specifically identify any and all CLEC ordering interfaces contemplated by the parties in the Interconnection Agreement dated October 5, 1999. In so doing, please provide any and all cites to the agreement where such interfaces are mentioned or otherwise discussed.

Interrogatory 27. Please specifically identify any and all CLEC ordering interfaces contemplated by the parties in the Interconnection Agreement dated July 15, 2002. In so doing, please provide any and all cites to the agreement where such interfaces are mentioned or otherwise discussed.

Interrogatory 28. Please identify any and all modifications BellSouth made to LENS subsequent to July 22, 1998 so that LENS provided the same online edit checking capability to Supra that BellSouth's retail ordering systems provide.

Interrogatory 29. Please identify any and all modifications BellSouth made to EDI subsequent to July 22, 1998 so that EDI provided the same online edit checking capability to Supra that BellSouth's retail ordering systems provide.

Interrogatory 30. Please identify any and all findings of KPMG in its Florida Third Party Test results specifically addressing, referencing, mentioning or otherwise discussing the issue of on-line edit checking.

Interrogatory 31. Please identify any and all Commission orders, work papers or other documents relating to the KPMG Florida Third Party Test that address on-line edit checking.

Interrogatory 32. Please identify any and all instructions provided by BellSouth to KPMG in regards to the Florida Third Party Test specifically related to the issue of on-line edit checking.

Interrogatory 33. Please identify any and all tests KPMG conducted in the Florida Third Party Test specifically focused on the issue of on-line edit checking.

Interrogatory 34. If your answer to Supra's First Request for Admission No. 1 is not an affirmative admission, i.e. "Admit," set forth all facts on which you base your response or denial to the Request for Admission.

Interrogatory 35. If your answer to Supra's First Request for Admission No. 2 is not an affirmative admission, i.e. "Admit," set forth all facts on which you base your response or denial to the Request for Admission.

Interrogatory 36. If your answer to Supra's First Request for Admission No. 3 is not an affirmative admission, i.e. "Admit," set forth all facts on which you base your response or denial to the Request for Admission.

Interrogatory 37. If your answer to Supra's First Request for Admission No. 4 is not an affirmative admission, i.e. "Admit," set forth all facts on which you base your response or denial to the Request for Admission.

Interrogatory 38. If your answer to Supra's First Request for Admission No. 5 is not an affirmative admission, i.e. "Admit," set forth all facts on which you base your response or denial to the Request for Admission.

Interrogatory 39. If your answer to Supra's First Request for Admission No. 6 is not an affirmative admission, i.e. "Admit," set forth all facts on which you base your response or denial to the Request for Admission.

Interrogatory 40. If your answer to Supra's First Request for Admission No. 7 is not an affirmative admission, i.e. "Admit," set forth all facts on which you base your response or denial to the Request for Admission.

Interrogatory 41. If your answer to Supra's First Request for Admission No. 8 is not an affirmative admission, i.e. "Admit," set forth all facts on which you base your response or denial to the Request for Admission.

Interrogatory 42. If your answer to Supra's First Request for Admission No. 9 is not an affirmative admission, i.e. "Admit," set forth all facts on which you base your response or denial to the Request for Admission.

Interrogatory 43. If your answer to Supra's First Request for Admission No. 10 is not an affirmative admission, i.e. "Admit," set forth all facts on which you base your response or denial to the Request for Admission.

Interrogatory 44. If your answer to Supra's First Request for Admission No. 11 is not an affirmative admission, i.e. "Admit," set forth all facts on which you base your response or denial to the Request for Admission.

Interrogatory 45. **Please identify when TAG was created and when TAG became fully functional for CLEC use.**

Interrogatory 46. Please identify the date upon which BellSouth provided EDI with pre-ordering capability.

Interrogatory 47. Please identify if and how TAG works with LENS.

Interrogatory 48. Please identify if and how TAG works with EDI.

Respectfully submitted this 13th day of July 2004.

SUPRA TELECOMMUNICATIONS
AND INFORMATION SYSTEMS, INC.
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By: Steven Chaiken / *Stu*
STEVEN B. CHAIKEN

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications and Information Systems, Inc. against BellSouth Telecommunications, Inc. for violation of the Telecommunications Act of 1996; petition for resolution of disputes as to implementation and interpretation of interconnection, resale and collocation agreements; and petition for emergency relief.

DOCKET NO. 980119-TP

FILED: JULY 13, 2004

SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1 – 7) TO
BELLSOUTH TELECOMMUNICATIONS, INC.

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, the Supra Telecommunications and Information Systems, Inc. ("Supra"), by and through its undersigned counsel, hereby serves the following Request for Production of Documents upon BellSouth Telecommunications, Inc. ("BellSouth").

DEFINITIONS

"You", "your", "Company" or "BellSouth" refers to BellSouth Telecommunications, Inc., its employees and authorized agents.

"Document" refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and/or software.

"Act" refers to the Communications Act of 1934 as amended by the Telecommunications Act of 1996.

REQUESTS FOR DOCUMENTS

Request No. 1: Please produce the KPMG report referenced in the testimony of Ronald Pate filed in this docket on or about April 21, 2004.

Request No. 2: Please produce any and all documents, associated work papers, or other findings related to the KPMG report relating to the issue of on-line edit check.

Request No. 3: Please produce any and all Commission orders relating to the KPMG Third Party Test relating to the issue of on-line edit checking.

Request No. 4: Please produce any and all transcripts of Commission meetings related to the KPMG Third Party Test relating to the issue of on-line edit checking.

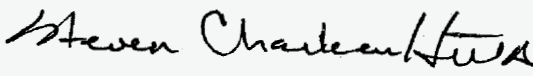
Request No. 5: Please produce any and all documents, including but not limited to agreements, referenced or relied upon by BellSouth in providing responses to Supra's Second Set of Interrogatories.

Request No. 6: Please produce any and all documents, including but not limited to agreements, referenced or relied upon by BellSouth in providing responses to Supra's First Request for Admissions.

Request No. 7: Please produce any and all instructions BellSouth provided to KPMG related to on-line edit checking in connection with the Third Party Test.

Respectfully submitted this 13th day of July 2004.

SUPRA TELECOMMUNICATIONS
AND INFORMATION SYSTEMS, INC.
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By: 
STEVEN B. CHAIKEN