

ORIGINAL

Matilda Sanders

From: Smith, Debbie N. [Debbie.N.Smith@BELLSOUTH.COM]
Sent: Tuesday, October 26, 2004 10:27 AM
To: Filings@psc.state.fl.us
Cc: Edenfield, Kip; Fatool, Vicki; Nancy Sims; Holland, Robyn P; Slaughter, Brenda ; Linda Hobbs; Bixler, Micheale
Subject: Florida Docket No. 040301-TP
Importance: High

- A. Debbie Smith
 Legal Secretary for E. Earl Edenfield, Jr.
 BellSouth Telecommunications, Inc.
 c/o Nancy Sims
 150 South Monroe, Rm. 400
 Tallahassee, FL 32301-1558
 (404) 335-0772
 debbie.n.smith@bellsouth.com
- B. Docket No. 040301-TP: In Re: Petition of Supra Telecommunications and Information Systems, Inc. for arbitration with BellSouth Telecommunications, Inc.
- C. BellSouth Telecommunications, Inc. on behalf of E. Earl Edenfield, Jr.
- D. 7 pages total in PDF format
- E. Today notification to Bayo of BellSouth Telecommunications, Inc.'s Supplemental Response to Supra Telecommunications and Information Systems, Inc.'s First Request for Production (Item No. 1).

Debbie Smith (sent on behalf of E. Earl Edenfield, Jr.)
 BellSouth Telecommunications, Inc.
 Suite 4300 - Legal Department

CMP _____
COM _____
 675 W. Peachtree Street
 Atlanta, GA 30375-0001
 Phone: (404) 335-0772

CTR _____

ECR <<BST's Supp. Resp. to Supra's 1st POD>>

GCL _____ *****

OPC _____

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DOCUMENT NUMBER-DATE

11569 OCT 26 04

10/26/2004

FPSC-COMMISSION CLERK

E. EARL EDENFIELD, JR.
Senior Attorney
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0763

October 26, 2004

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

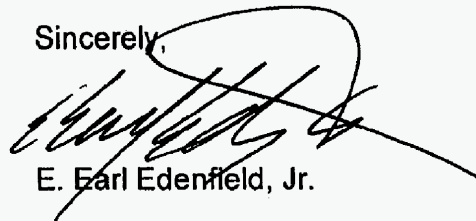
**Re: Docket No.: 040301-TP
Petition of Supra Telecommunications and Information Systems, Inc. for
Arbitration with BellSouth Telecommunications, Inc.**

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. served its Supplemental Response to Supra's First Request for Production (Item No. 1).

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

Sincerely,



E. Earl Edenfield, Jr.

Enclosure

cc: All Parties of Record
Marshall M. Criser III
Nancy B. White
R. Douglas Lackey

DOCUMENT NUMBER-DATE

11569 OCT 26 3

Fpsc-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 040301-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and U.S. Mail this 26th day of October, 2004 to the following:

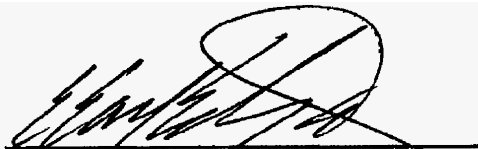
Jason Rojas
Jeremy Susac
Staff Counsels
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Tel No. (850) 413-6179 or 6236
Fax No. (850) 413-6250
jrojas@psc.state.fl.us
jsusac@psc.state.fl.us

Ann H. Shelfer
Supra Telecommunications &
Information Systems, Inc.
Koger Center – Ellis Building
1311 Executive Center Drive
Suite 220
Tallahassee, FL 32301-5067
Tel. No. (850) 402-0510
Fax. No. (850) 402-0522
ashelfer@stis.com

Brian Chaiken (+)
Supra Telecommunications &
Information Systems, Inc.
2620 S. W. 27th Avenue
Miami, FL 33133
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To receive discovery related material only

John Duffey
Division of Competitive
Markets & Enforcement
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Tel No. (850) 413-6828
jduffey@psc.state.fl.us



E. Earl Edenfield, Jr.

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

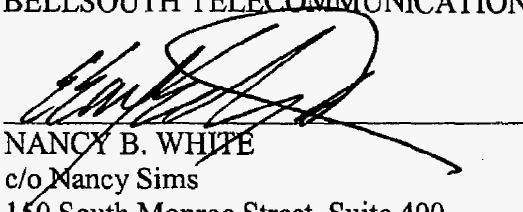
In Re: Petition of Supra Telecommunications)
 and Information Systems, Inc.'s for) Docket No.: 040301-TP
 arbitration with BellSouth)
 BellSouth Telecommunications, Inc.)
 _____) Filed: October 26, 2004

BELLSOUTH TELECOMMUNICATIONS, INC.'S SUPPLEMENTAL RESPONSE TO SUPRA'S FIRST REQUEST FOR PRODUCTION

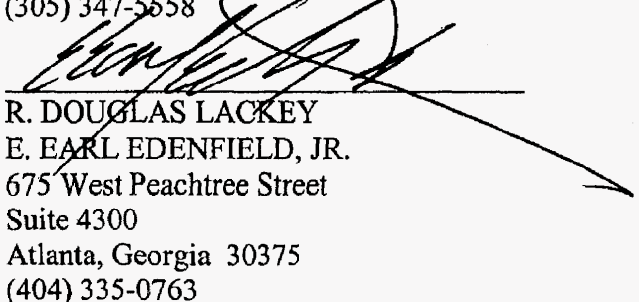
BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to the Order Granting in Part and Denying in Part Supra Telecommunications and Information Systems, Inc.'s Motion to Compel (Order No. PSC-04-1017-PCO-TP) dated October 19, 2004, files the attached Supplemental Response to Item No. 1 of Supra Telecommunications and Information Systems, Inc.'s ("Supra") First Request for Production dated July 22, 2004.

Respectfully submitted this 26th day of October 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE
 c/o Nancy Sims
 150 South Monroe Street, Suite 400
 Tallahassee, Florida 32301
 (305) 347-5558



R. DOUGLAS LACKEY
 E. EARL EDENFIELD, JR.
 675 West Peachtree Street
 Suite 4300
 Atlanta, Georgia 30375
 (404) 335-0763

554730

DOCUMENT NUMBER-DATE

11569 OCT 26 04

FPSC-COMMISSION CLERK

REQUEST: Please provide all testimonies, transcripts, exhibits, orders, and any related documents in FPSC Docket No. 990649-TP (BellSouth Track) which specifically support BellSouth's claim that the FPSC has already set a UNE-P to UNE-L conversion rate in excess of \$57.00.

RESPONSE:

**FLORIDA DOCKET NO. 990649-TP
GENERIC UNE COST DOCKET**

Filed by BST on May 1, 2000

Direct Testimony

Dr. Randall S. Billingsley	RSB 1-11
D. Daonne Caldwell	DDC 1-4
G. David Cunningham	GDC 1-4
W. Keith Milner	WKM-1
Joseph H. Page	JHP-1
Walter S. Reid	WSR 1-4
James W. Stegeman	JWS 1-5
Alphonso J. Varner	AJV-1

Filed by BST on June 29, 2000

Rebuttal Testimony

Dr. Randall S. Billingsley	RSB 12-17
D. Daonne Caldwell	DDC-5
G. David Cunningham	GDC-5
W. Keith Milner	
Alphonso J. Varner	AJV 1-2

RESPONSE: (Cont.)

Filed by BST on August 18, 2000

Phase II Revised Direct Testimony

D. Daonne Caldwell	DDC-1 DDC-2 DDC-4 DDC-6
Walter S. Reid	WSR 3-4
James W. Stegeman	
Alphonso J. Varner	AJV-1

Filed by BST on August 21, 2000

Phase II Rebuttal Testimony

D. Daonne Caldwell	DDC 7-10
H. B. Greer	
Wiley G. Latham	
W. Keith Milner	WKM-2
Joseph H. Page	JHP 1-4
Ronald M. Pate	
Walter S. Reid	WSR 1-2
James W. Stegeman	JWS-1-2
Alphonso J. Varner	AJV-1

BST Corrected Revised Direct Exhibit filed on September 5, 2000

Alphonso J. Varner - Exhibit AJV-1

BST Rebuttal Testimony Corrections filed on September 11, 2000

Joseph H. Page - Testimony - JHP-03

RESPONSE: (Cont.)

Filed by BST on November 8, 2001

Direct Testimony

D. Daonne Caldwell	DDC 1_120
	DDC 2_120
James W. Stegeman	
Jerry Kephart	

Filed by BST on December 26, 2001

Surrebuttal

D. Daonne Caldwell	DDC 3_120
	DDC 4_120
	DDC 4_120
John A. Ruscilli	
Jerry Kephart	
Thomas G. Williams	TGW 1-3
James Stegeman	JWS-1

Filed by BST on January 14, 2002

Surrebutal Testimony

John A. Ruscilli

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 040301-TP
Supra's 1st Request for Production
July 22, 2004
Supplemental Item No. 1
Page 4 of 4

RESPONSE: (Cont.)

Filed by BST on January 28, 2002

Redlined Version of Revised 11/8/01 Direct Testimony

D. Daonne Caldwell

DDC 1_120

DDC 2_120

James W. Stegeman

Jerry Kephart

Revised 12/26/01 Surrebutal Testimony

D. Daonne Caldwell

DDC 3_120