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November 8, 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. 040301-TP -
SUPRA'S MOTION FOR LEAVE TO FILE DISCOVERY ONE DAY LATE AND
NOTICE OF SERVICE OF ITS THIRD SET OF REQUEST FOR ADMISSIONS ON
BELLSOUTH**

Dear Mrs. Bayo:

Enclosed is the original and fifteen (15) copies of Supra Telecommunications and Information Systems, Inc.'s (Supra) Motion For Leave To File Discovery One Day Late And Notice Of Service Of Its Third Set Of Request For Admissions On Bellsouth to be filed 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,

Brian Chaiken
Executive Vice President, Legal Affairs

DOCUMENT NUMBER-DATE

12027 NOV-8 3

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

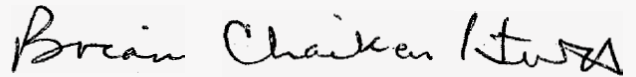
Docket No. 040301-TP

I HEREBY CERTIFY that a true and correct copy of the following was served via Facsimile, E-Mail, Hand Delivery, and/or U.S. Mail this 8th day of November 2004 to the following:

Jason Rojas/Jeremy Susac
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Nancy White
c/o Ms. Nancy H. Sims
BellSouth Telecommunications, Inc.
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/ 476-4248
Facsimile: 305/ 443-1078



By: Brian Chaiken

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Supra Telecommunications) DOCKET NO. 040301-TP
and Information Systems, Inc. for arbitration)
with BellSouth Telecommunications, Inc.) DATE: November 8, 2004

**SUPRA TELECOMMUNICATIONS AND INFORMATION
SYSTEMS, INC.'S MOTION FOR LEAVE TO FILE DISCOVERY ONE DAY LATE**

SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.

(“Supra”), by and through its undersigned counsel, hereby moves the Commission for Leave to file discovery in this proceeding one day late, and as grounds therefore states:

1. According to Order No. PSC-04-0809-PCO-TP, Docket No. 040301-TP, issued on August 19, 2004, “all discovery shall be completed by November 5, 2004.” (Id. at 2)
2. On November 3 and 4, 2004, in Atlanta, Supra deposed BellSouth’s witness with most knowledge regarding BellSouth’s hot cut processes, as well as a BellSouth subject matter expert regarding work elements contained in BellSouth’s purported hot cut cost study. At the deposition, Supra obtained information that warrants further discovery regarding a factual issue which would help resolve the parties’ disagreement regarding the application of the “Covad cross-connect charges” that BellSouth seeks to apply.
3. Supra has conferred with Commission staff with respect to this filing, however, Supra has yet to confer with BellSouth on the same. Supra believes that a one-day time extension which will allow Supra to serve its Third Set of Request For Admissions on BellSouth, will not prejudice BellSouth. Indeed, Supra believes that granting this one-day extension will allow Supra to obtain valuable information that

will help the parties efficiently manage the hearing process and further provide staff with useful information in this proceeding.

4. But for the depositions taken on November 3 and 4, and travel time attendant thereto, Supra would have timely filed these additional discovery requests on November 5, 2004.

5. Supra has attached a copy of its Third Set of Request For Admissions hereto as **Exhibit A,**

WHEREFORE, Supra respectfully requests that this Honorable Commission grant it leave to file its Third Set of Request For Admissions one day late, and for such other relief as is deemed equitable and just.

Respectfully submitted this 8th day of November, 2004.

SUPRA TELECOMMUNICATIONS
AND INFORMATION SYSTEMS, INC.



Brian Chaiken / Supra

BRIAN CHAIKEN
2620 S.W. 27th Avenue
Miami, Florida 33133
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Supra)
Telecommunications and Information) Docket No. 040301-TP
Systems, Inc.'s for arbitration)
with BellSouth Telecommunications, Inc.) Filed: November 8, 2004
_____)

**SUPRA TELECOMMUNICATIONS AND
INFORMATION SYSTEMS, INC.'S THIRD REQUEST FOR
ADMISSIONS TO BELLSOUTH TELECOMMUNICATIONS, INC.**

SUPRA TELECOMMUNICATIONS and INFORMATION SYSTEMS, INC. ("Supra"), through its undersigned counsel, hereby serves its Third Set of Admissions upon BELLSOUTH TELECOMMUNICATIONS, INC. ("BellSouth"), to be answered by November 19, 2004, consistent with Order No. PSC-04-1048-PCO-TP, issued on November 4, 2004.

ADMISSIONS

25. Please admit that in each and every BellSouth Central Offices listed below in Table 1 Supra has purchased and currently maintains cabling from its switch(s) or other voice equipment to blocks on BellSouth's MDF located within the listed BellSouth central offices in the state of Florida.

	OFFICE	Number of DSO Blocks	DSO Block Type	Frame Side	Frame Type
1	Golden Glades	13	256 pair	Horizontal	MDF
2	Red Road	13	256 pair	Horizontal	MDF
3	Hialeah	6	200 Pair	Horizontal	MDF
4	Biscayne	11	100 Pair	Horizontal	MDF
5	Palmetto	6	200 Pair	Horizontal	MDF
6	Perrine	36	200 Pair	Horizontal	MDF
7	Pembroke Pines	8	200 Pair	Horizontal	MDF
8	West Hollywood	8	200 Pair	Horizontal	MDF
9	Ft. Lauderdale Main	8	200 Pair	Horizontal	MDF
10	Plantation	8	200 Pair	Horizontal	MDF
11	Boca Main	11	100 Pair	Vertical	MDF
12	Green Acres	11	100 Pair	Vertical	MDF
13	WPBH Gardens	16	100 Pair	Horizontal	MDF
14	Jacksonville	3	200 Pair	Vertical	MDF
15	Melbourne	3	200 Pair	Vertical	MDF
16	Datona Beach	3	200 Pair	Vertical	MDF
17	Orlando	3	200 Pair	Vertical	MDF
18	Pensacola Main	3	200 Pair	Vertical	MDF

Table 1 Supra owned Blocks on BellSouth MDF

26. Please admit that each and every BellSouth Central Office where Supra has purchased UNE-L loops from BellSouth is listed in Table 1.

27. Please admit that the arrangement described in 25 above is identical to the arrangement numbered "7" to the exhibit to the deposition of Mr. Kenneth Ainsworth dated November 4, 2004 (attached as Exhibit B.).

28. Admit that for each and every UNE-L loop ordered by Supra and provisioned by Bellsouth in the Central Offices listed in Table 1 were provisioned by connecting a 2 wire jumper between block number "2" and block number "7" on exhibit to the deposition of Mr. Kenneth Ainsworth dated November 4, 2004 (attached as Exhibit B.).

29. Admit that Supra has not ordered, and BellSouth has not provisioned any crossconnect, tiepair, jumper (or other named connection) from block number "2" to block "3" to block "4" to block "5" relative to the exhibit to the deposition of Mr. Kenneth Ainsworth dated November 4, 2004 (attached as Exhibit B.)

30. Admit that Supra has not ordered, and BellSouth has not provisioned any crossconnect, tiepair, jumper (or other named connection) from block number "2" to block "3" to block "4" to block "5" to block "6" relative to the exhibit to the deposition of Mr. Kenneth Ainsworth dated November 4, 2004 (attached as Exhibit B.)

31. Admit that BellSouth bills Supra for a PE1P2 crossconnect for each and every UNE-L loop Supra purchases from BellSouth.

32. Admit that the PE1P2 crossconnect as described in the BellSouth FCC #1 tariff, section 13.3.23 "Physical Access Cross Connect" is the same PE1P2 Supra is billed wholesale rates for from Attachment 3 of the parties Interconnection agreement, subject to the wholesale terms and conditions but otherwise technically identical to the PE1P2 Federally tariffed crossconnect.

33. Admit that the wholesale PE1P2 crossconnect is implemented in the same manner that was described for the Federally Tarriffed PE1P2 crossconnect, at the deposition of Mr. Kenneth Ainsworth dated November 4, 2004 (attached as Exhibit B.)

34. Admit that both the Federal and wholesale PE1P2 crossconnects are provisioned from block number "2" to block "3" to block "4" to block "5" relative to the exhibit to the deposition of Mr. Kenneth Ainsworth dated November 4, 2004 (attached as Exhibit B.) When the customer interconnects at the IDF.

35. Admit that both the Federal and wholesale PE1P2 crossconnects are routed from block number "2" to block "3" to block "4" to block "5" to block "6" relative to the exhibit to the deposition of Mr. Kenneth Ainsworth dated November 4, 2004 (attached as Exhibit B.) When the customer interconnects at its own POTS bay.

36. Admit that the "15% carried in other transport elements" factor in the Central Office Forces work element estimates was applied to the 2wire Analog VG loop NRC cost study, because of a BellSouth estimate that 15% of the 2 wire crossconnects **actually placed** by BellSouth had nothing to do with the loop types under consideration in this Docket. Instead, the crossconnects were associated with alarm circuits, infrastructure, and the **additional 2 or more** crossconnects required to add DSL to a functioning voice circuit.

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