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Public Service Commission
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-M-E-M-O-R-A-N-D-U-M- COMMISSION CLERK

DATE: January 6, 2005
TO: Blanca S. Bayó, Commission Clerk and Administrative Services Director
FROM: Lee Fordham, ^{LF} Senior Attorney, Office of the General Counsel
RE: Filing in Docket No. 040732

The attached Response to BellSouth Telecommunications, Inc. Affirmative Defenses and Counterclaim was provided only to the office of the General Counsel and was not properly filed with the office of the PSC Clerk.

Accordingly, please make this filing a part of the official record in this Docket.

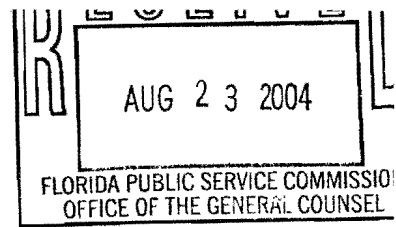
Cc: Laura King
Lee Fordham

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FPSC-COMMISSION CLERK



BEFORE THE PUBLIC SERVICE COMMISSION

In re: Interconnection Agreement between)
Saturn Telecommunication Services, Inc.)
d/b/a STS Telecom and BellSouth)
Telecommunications, Inc.)

Docket No.: 040-732-TP

Filed: July 29, 2004

SATURN TELECOMMUNICATION SERVICES, INC. d/b/a STS TELCOM and
BELLSOUTH TELECOMMUNICATIONS, INC.
RESPONSE TO BELLSOUTH TELECOMMUNICATION'S AFFIRMATIVE
DEFENSES and COUNTERCLAIM

Petitioner Saturn Telecommunications Services, Inc. d/b/a STS Telecom, LLC., ("STS") by and through its undersigned counsel and files its Response to BellSouth Telecommunications, Inc. ("BellSouth") Affirmative Defenses and Counterclaim and states:

1. STS denies each and every affirmative defense raised by BellSouth in its Response to STS's Petition.
2. STS denies each and every allegation raised in BellSouth's Counterclaim in its Response to STS's Petition.

WHEREFORE, STS requests that BellSouth's Counterclaim be dismissed.

Respectfully submitted,

ALAN C. GOLD, P.A.
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BY: 
ALAN C. GOLD, ESQUIRE
Florida Bar Number: 304875

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U.S. Mail this 19 day of August 2004, to the following:

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

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c/o Nancy H. Sims
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BY: ALAN C. GOLD, ESQUIRE
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