



COUNTY ATTORNEY
METROPOLITAN DADE COUNTY, FLORIDA

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COMMISSION
CLERK

AVIATION DEPARTMENT
P.O. BOX 592075 AMF
MIAMI, FLORIDA 33159-2075
Phone (305) 876-7040
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August 25, 2005

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard

**Re: Complaint by BellSouth Telecommunication, Inc., Regarding the
Operation of a Telecommunication Company by Miami-Dade County
in Violation of Florida Statutes and Commission Rules
(Docket No. 050257)**

Dear Mrs. Bayó:

Enclosed is an original and fifteen (15) copies of Miami-Dade County's Preliminary List of Issues. An additional copy of this document is enclosed. Please return this stamped filed copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

David Stephen Hope
Assistant County Attorney

- CMP _____
- COM _____ cc: All Parties of Record
- _____ Cynji Lee
- CTR _____ Roy Wood
- ECR _____
- GCL _____
- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC 1
- OTH _____

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FPSC-BUREAU OF RECORDS



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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth)
Telecommunications, Inc., Regarding)
The Operation of a Telecommunications)
Company by Miami-Dade County in)
Violation of Florida Statutes and)
Commission Rules)

Docket No. 050257

MIAMI-DADE COUNTY'S PRELIMINARY LIST OF ISSUES

Miami-Dade County (the "County"), through its undersigned counsel, hereby files its Preliminary List of Issues in the above-captioned proceeding:

ISSUES:

1. Whether the County's continued operation and provision of shared tenant services ("STS") at Miami International Airport ("MIA") by the Miami-Dade Aviation Department is exempt from the STS rules pursuant to § 364.339(3)(a), Florida Statutes and Rule 25-24.580, Florida Administrative Code (the "Airport Exemption").
2. Whether the County's continued provision of shared tenant services to the MIA Airport Hotel on a partitioned basis and other concessions located at Miami International Airport is exempt from the STS rules pursuant to Rule 25-24.580, Florida Administrative Code.
3. Whether the County's continued operation and provision of shared tenant services at Miami International Airport is exempt from certification as an STS provider and grandfathered pursuant to the Florida Public Service Commission order in *Investigation into Appropriate Rates and Conditions of Service for Shared Local Exchange Telephone Service*, Docket No. 860455-TL, Order No. 17111 (Jan. 15, 1987), *recon. denied and clarified*, Order No. 17369 (issued Apr. 6, 1987).

DOCUMENT NUMBER-DATE

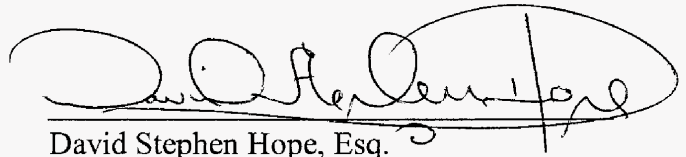
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4. Whether a changed requirement which mandates that governmental entities and airport operators obtain a certificate of public convenience and necessity to provide shared tenant services and eliminates the Airport Exemption harms and negatively impacts the need for continued control and operation of the airport, and the safe and secure transportation of passengers and freight throughout the airport campus.

Dated: August 25, 2005

Respectfully submitted,

Murray A. Greenberg
Miami-Dade County Attorney

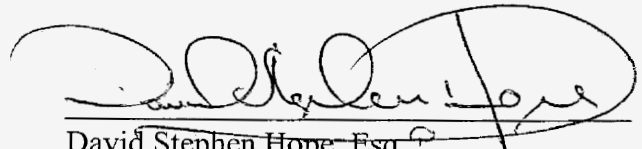


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Washington, DC 20007
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this *25th* day of August 2005, to: *Nancy B White, Esq.* and *Sharon R. Liebman, Esq.*, c/o Nancy H. Sims, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, Florida, 32301; and *R. Douglas Lackey, Esq.*, BellSouth Telecommunications, Inc., 675 West Peachtree Street, N.E., Suite 4300, Atlanta, Georgia 30375.

A handwritten signature in black ink, appearing to read "David Stephen Hope". The signature is written in a cursive style with a large, sweeping flourish at the end.

David Stephen Hope, Esq.
Assistant County Attorney