

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Complaint by Florida BellSouth customers who paid fees to BellSouth Telecommunications, Inc. related to Miami-Dade County Ordinance Section 21-44 ("Manhole Ordinance") and request that Florida Public Service Commission order BellSouth to comply with Section A.2.4.6 of General Subscriber Service Tariff and refund all fees collected in violation thereof.

DOCKET NO. 050194-TL

DATED: SEPTEMBER 13, 2005

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one correct copy of STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO BELL SOUTH TELECOMMUNICATIONS, INC. (NOS. 3 - 13) has been served by U. S. mail to Nancy White/Sharon Liebman/R. Douglas Lackey, c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301-1556 and that a true copy thereof has been furnished to the following by U. S. mail this 13th day of September, 2005:

Aronovitz Trial Lawyers
Tod Aronovitz/Barbara Perez
Museum Tower, Suite 2700
150 West Flagler Street
Miami, Florida 33130

Aylstock Law Firm
Justin G. Witkin/Joshua A. Jones
P.O. Box 1147
Gulf Breeze, Florida 32562-1147

Harke Law Firm
Lance Harke/Howard Bushman
155 South Miami Avenue, Suite 600
Miami, Florida 33130


KIRA SCOTT
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850) 413-6199

DOCUMENT NUMBER-DATE

08661 SEP 13 05

FPSC-COMMISSION CLERK