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From:

Fatool, Vicki [Vicki.Fatool@BellSouth.COM]

Sent:

Thursday, October 13, 2005 2:55 PM

To:

Filings@psc.state.fl.us

Subject:

050194-TL (Today Letter) BST's Responses and Obj. to Staff's 2nd Set of Discovery

Importance: High

Attachments: 050194-T.pdf

A. Vicki Fatool

Legal Secretary to Nancy B. White and Manuel Gurdian

BellSouth Telecommunications, Inc.

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5560

vicki.fatool@bellsouth.com

- Docket No. 050194-TL: 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.
- C. BellSouth Telecommunications, Inc. on behalf of Nancy B. White, Sharon Liebman and Manuel Gurdian
- D. 2 pages total (including letter and certificate of service)
- E. BellSouth Telecommunications, Inc.'s Responses to Staff's Second Set of Interrogatories and Second Production of Documents

.pdf version attached

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MANUEL A. GURDIAN Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561

October 13, 2005

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

Re: <u>Docket No. 050194-TL</u>: 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.

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. served its Responses and Objection to the Staff of the Florida Public Service Commission's Second Set of Interrogatories and Second Production of Documents in the captioned docket.

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

Sincerely,

Manuel A. Gurdian

cc: All Parties of Record Jerry D. Hendrix R. Douglas Lackey Nancy B. White

DOCUMENT NUMBER-DATE

09864 OCT 13 &

FPSC-COMMISSION A

CERTIFICATE OF SERVICE Docket No. 050194-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail, (*) Hand Delivery and First Class U. S. Mail this 13th day of October,

2005 to the following:

Lee Fordham (*)
Kira Scott (*)
Staff Counsels
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
cfordham@psc.state.fl.us
kscott@psc.state.fl.us

Justin G. Witkin, Esq. Joshua Jones, Esq. Aylstock, Witkin & Passer, P.L.C. 55 Baybridge Drive P.O. Box 1147 32562-1147 Gulf Breeze, FL 32561 Tel. No. (850) 916-7450

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Barbara Perez, Esq.
Museum Tower, Suite 2700
150 West Flagler Street
Miami, Florida 33130

Maruel A. Gurdian