

**ORIGINAL**

**Matilda Sanders**

**From:** Fatool, Vicki [Vicki.Fatool@BellSouth.COM]  
**Sent:** Thursday, January 26, 2006 9:27 AM  
**To:** Filings@psc.state.fl.us  
**Subject:** 050257-TL BellSouth Telecommunications, Inc.'s and Miami-Dade County's Joint Motion for Entry of Order Adopting Proposed Joint Procedural Schedule  
**Importance:** High  
**Attachments:** 050257-T.pdf

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 RCA \_\_\_\_\_  
 SCR \_\_\_\_\_  
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 SEC 1  
 OTH kump

A. Vicki Fatool  
 Legal Secretary to Nancy B. White & Manuel A. Gurdian  
 BellSouth Telecommunications, Inc.  
 150 South Monroe Street  
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 (305) 347-5560  
[vicki.fatool@bellsouth.com](mailto:vicki.fatool@bellsouth.com)

B. Docket No. 050257-TP

Complaint by BellSouth Telecommunications, Inc., Regarding the Operation of a Telecommunications Company by Miami-Dade County in Violation of Florida Statutes and Commission Rules

C. BellSouth Telecommunications, Inc.  
 on behalf of Nancy B. White

D. 5 pages total (includes letter, certificate of service and pleading)

E. BellSouth Telecommunications, Inc.'s and Miami-Dade County's Joint Motion for Entry of Order Adopting Proposed Joint Procedural Schedule

pdf

<<050257-T.pdf>>

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Legal Department

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General Counsel - Florida

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January 26, 2006

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

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

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s and Miami-Dade  
County's Joint Motion for Entry of Order Adopting Proposed Joint Procedural  
Schedule, which we ask that you file in the captioned docket

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

Sincerely,

  
Nancy B. White

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

DOCUMENT NUMBER-DATE

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**CERTIFICATE OF SERVICE  
Docket No. 050257-TL**

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

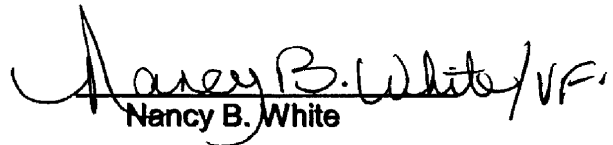
Electronic Mail and First Class U. S. Mail this 26<sup>th</sup> day of January, 2006 to the following:

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Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth Tele-	)	
Communications, Inc., Regarding	)	
The Operation of a Telecommunications	)	DOCKET NO. 050257-TL
Company by Miami-Dade County in	)	
Violation of Florida Statutes and	)	
Commission Rules	)	

**JOINT MOTION FOR ENTRY OF ORDER ADOPTING PROPOSED JOINT  
PROCEDURAL SCHEDULE FOR  
DOCKET NO. 050257-TL**

BellSouth Telecommunications, Inc. and Miami-Dade County (jointly the "Parties") hereby submit their Joint Motion for Entry of Order Adopting Proposed Joint Procedural Schedule for Docket No. 050257-TP. The Parties and their respective counsel have met and conferred with each other and with Commission Staff to devise an agreed Procedural Schedule for this matter. The Parties have thus agreed to the following proposed Procedural Schedule:

1. The Parties will exchange preliminary exhibit lists thirty (30) days<sup>1</sup> following the date of issuance of the Procedural Scheduling Order by the Commission.
2. The discovery period shall commence three (3) days from the date the preliminary exhibit lists are exchanged and shall be subject to the following deadlines:
  - a. Objections to discovery requests shall be served within seven (7) days of service of the discovery request;
  - b. The party serving the discovery to which an objection has been filed shall have three (3) days to file a response to objections;
  - c. Discovery responses shall be due within twenty (20) days of service of discovery.

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<sup>1</sup> The Parties agree that all deadlines shall be calculated in accordance with Rule 1.090(a) of the Florida Rules of Civil Procedure.

d. The Parties shall not propound interrogatories or requests for admissions, unless approved by the non-issuing Party or the Prehearing Officer;

e. Discovery may consist of requests for production of documents and depositions as necessary.

f. The Prehearing Officer shall rule on discovery disputes on an expeditious basis; and

g. The discovery period shall terminate forty-five (45) days from the date discovery commences.

3. The Parties shall exchange their proposed final exhibit lists twenty (20) days after the termination of the discovery period or twenty (20) days after resolution of all discovery disputes, whichever date is later.

4. Good cause shall be required for a party to add exhibit(s) to the proposed final exhibit list that were not listed on the preliminary exhibit list except for exhibits identified and produced during discovery.

5. Twenty (20) days after the exchange of the final exhibit list between the Parties, the Parties shall either:

a. File a joint stipulated exhibit list with the Commission, asking the Prehearing Officer to approve the joint exhibit list as the evidentiary record for the case; OR

b. File a joint exhibit list with objections to specific exhibits and reasons therefore. Non-objecting parties shall have five (5) days to respond in writing to objections. The Prehearing Officer will rule on the objections and approve the resulting exhibit list as the evidentiary record for the case.

6. Direct briefs will be filed thirty (30) days after the filing of the joint stipulated exhibit list or thirty (30) days after the resolution of all exhibit list objections.

7. Reply briefs will be filed fifteen (15) days after the service of the direct brief.

8. All filings will be accomplished via e-mail and overnight delivery.

9. The Parties request that oral argument be conducted after the Commission Staff issues their recommendation. Commission Staff indicated their preference is to have oral argument prior to submission of their recommendation.

Pursuant the Commission Staff recommendation, oral argument shall be conducted at agenda or special setting of the full Commission as the Commission decides.

Respectfully submitted:

BELLSOUTH TELECOMMUNICATIONS,  
INC.

MIAMI-DADE COUNTY



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