

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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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

COMMISSION  
CLERK

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**MIAMI-DADE COUNTY'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Fla. R. Civ.P. 1.350 and Order No. PSC-06-0326-PCO-TL, Miami-Dade County (the "County"), by and through undersigned counsel, requests BellSouth Telecommunications, Inc. ("BellSouth"), to produce for inspection and copying all documents listed in the attached "Schedule A" to the extent said documents may be in BellSouth's custody or under its control, at the Office of the County Attorney, 111 Northwest 1st Street, Suite 2800, Miami, Florida 33128-1993, within twenty (20) days from the date of service hereof. If BellSouth elects to furnish copies, the County will pay for the duplication and "bates" numbering of one (1) set of documents by a copying service

of its choice.

**DEFINITIONS**

For purpose of this request, the following definitions apply:

A. The term "BellSouth" shall be deemed to include BellSouth Telecommunications, Inc., BellSouth Corporation,<sup>1</sup> or any division, department, or subsidiary of BellSouth Corporation.

Formerly known as Southern Bell Telephone & Telegraph Company.

CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
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EC \_\_\_\_\_  
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- B. The term “Complainant”, “you”, “your”, and any synonym thereof and derivatives therefrom are intended to and shall embrace and include BellSouth, its attorneys and accountants, and all of its respective agents, servants, associates, employees, representatives, investigators, parent companies, subsidiaries, sister companies, and others who are or have been in possession of or may have obtained information for or on behalf of such Complainant in any manner with respect to any matter referred to the pleadings in the above styled case.
- C. The term “document” shall be deemed to include every record of every type including, without limitation, information stored on any electromagnetic storage device; any written, printed, typed, recorded, stored, emailed, or graphic matter, however produced, reproduced, or existing in the possession, custody, or control of the Complainant, or any agent employee, or attorney of the Complainant or any of them; and all drafts, notes, or preparatory material concerned with said document, and every additional copy of such record or document where such copy contains any commentary, notation, or other change whatsoever that does not appear on the original or other copy of the documents produced. In all cases where original or non-original copies are not available, “document” also means identical copies of original documents and copies of non-identical copies.

The term “document” shall be deemed also to include any summary of the document or documents called for hereafter, telegrams, teletypes, telex messages, facsimiles, recordings of telephone calls and other communications (including, but not limited to notes, notations, memoranda and other writings of or relating to telephone conversations and conferences), minutes and notes of transcriptions of all meetings and other communications of any type, microfilm dictobels, tapes or other records, logs and any other information which is stored or

carried electronically, by means of computer equipment or otherwise, and which can be retrieved in printed or graphic form.

- D. The term “person” shall be deemed to include any individuals, natural persons, partnerships, firms and corporations and all of their subsidiaries or divisions, and in the case of partnerships, firms, and corporation, the individual member(s) or agents(s) thereof.
- E. The term “relating to” includes referring to, embodying, in connection with, commenting on, responding to, sharing, describing, concerning, analyzing, reflecting, or constituting.
- F. Terms in the plural include the singular and terms in the singular include the plural.

### **INSTRUCTIONS**

- A. If any documents requested are not produced but are withheld on a claim of privilege, please identify each such document by providing the date of its preparation, the name of the persons preparing and receiving it, and the identity of each person to whom a copy of such document has been delivered, or to whom disclosure of the document was made, either orally or in writing.
- B. Documents produced shall be segregated and marked according to the request(s) in response to which they are produced.

## **SCHEDULE "A"**

1. All correspondence between BellSouth, BellSouth Corporation, or any division, department, or subsidiary of BellSouth Corporation, and the Florida Public Service Commission ("PSC") pertaining to the provision of telecommunications services by Miami-Dade County or the Miami-Dade Aviation Department ("MDAD") at Miami International Airport ("MIA").
2. All territory analysis, sector analysis, product development, business development, marketing, market segmentation, and revenue development studies, plans, forecasts, models, or projections of Complainant, related to the provision of telecommunications services at MIA.
3. All territory analysis, sector analysis, product development, business development, marketing, market segmentation, and revenue development studies, plans, forecasts, models, or projections of Complainant, related to the provision of telecommunications services to MDAD.
4. All competitive analysis, territory analysis, sector analysis, product development, business development, marketing, market segmentation, and revenue development studies, plans, forecasts, models, or projections of Complainant, related to the provision of telecommunications services at MIA by the County or MDAD.
5. All documents pertaining to In re: Investigation into Appropriate Rates and Conditions of Service for Shared Local Exchange Telephone Service, Docket No. 860455-TL, Order No. 17111, issued January 15, 1987, including but not limited to, summaries of PSC orders, internal memoranda, transcripts, testimony, and correspondence.
6. All documents pertaining to In re: Dispute between Dade County Aviation Department and BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company Related to Telephone Serving Arrangements at Airports in Dade County, Docket No. 931033-TL, Order No. PSC-94-0123-TL, issued February 1, 1994, including but not limited to, summaries of PSC orders, internal memoranda, transcripts, testimony, and correspondence.
7. All correspondence with Centel Communications Company pertaining to the provision of telecommunications services at MIA.
8. All correspondence with WilTel Communications System pertaining to the provision of telecommunications services at MIA.
9. All correspondence with Williams Communications Solutions, LLC, pertaining to the provision of telecommunications services at MIA.
10. All correspondence with NextiraOne, LLC, pertaining to the provision of telecommunications services at MIA.
11. All correspondence, documents, or reports that support Complainant's allegations in paragraph 13 of its Complaint.

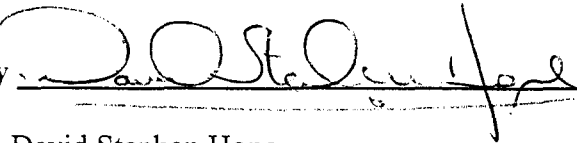
12. All correspondence, documents, or reports that support Complainant's allegations in paragraph 14 of its Complaint.
13. All correspondence, documents, or reports that support Complainant's allegations in paragraph 15 of its Complaint.
14. All correspondence, documents, or reports that support Complainant's allegations in paragraph 22 of its Complaint.

RESPECTFULLY SUBMITTED,

MURRAY A. GREENBERG  
MIAMI-DADE COUNTY ATTORNEY

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By



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this *14th* day

of June 2006, to:

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c/o Nancy H. Sims  
BellSouth Telecommunications, Inc.  
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Tallahassee, Florida, 32301

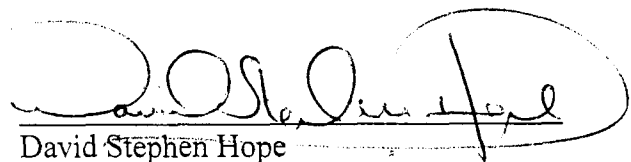
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