

ORIGINAL

Timolyn Henry

From: Griffin, Kecia (CAO) [KGRIFFIN@miamidade.gov]  
 Sent: Friday, June 23, 2006 4:53 PM  
 To: Filings@psc.state.fl.us  
 Cc: mgoldberg@lashgoldberg.com; jean.kiddoo@bingham.com; dcdurt@ham.com; Adam Teitzman; dstarcher@broadandcassel.com; james.meza@BellSouth.com; Sharon.Liebman@bellsouth.com; earl.edefield@bellsouth.com; Lee, Cynji (Airport); Hope, David (Airport); Hope, David (CAO)  
 Subject: FW: PSC County's Response  
 Attachments: PSC County's Responses to Objections to First Request Production).pdf

June 23, 2006

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 Miami-Dade County's Response to BellSouth Telecommunications, Inc.'s Objections to Miami-Dade County's First Request for Production of Documents.

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

cc: All Parties of Record  
 David Stephen Hope

- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
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 FPSC-COMMISSION CLERK

ORIGINAL

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 RESPONSES TO BELLSOUTH  
TELECOMMUNICATIONS, INC.'S OBJECTIONS TO MIAMI-DADE COUNTY'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Miami-Dade County (the "County"), by and through its undersigned counsel, hereby serves its Responses to BellSouth Telecommunications Inc.'s ("BellSouth") Objections to the County's First Request for Production (the "Request"), pursuant to Order No. PSC-06-0326-PCO-TL and states as follows:

**County's Specific Responses to BellSouth's  
General Objections to the Request (1 through 14)**

**Objection No. 4:**

BellSouth objects to the [County's] Requests to the extent they are vague, ambiguous and/or broad and thereby seek information or documentation which is wholly unrelated to the matters involved in this action and not reasonably calculated to lead to the discovery of admissible evidence.

**Response to Objection No. 4:**

The County's requests are not overly broad and are related to the matters involved in this action. The specific timeframe for the responses requested is from 1982 to the present. This timeframe is appropriate because it was in 1982 that the County, through the Dade County

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DOCUMENT NUMBER-DATE

OFFICE OF COUNTY ATTORNEY, MIAMI-DADE COUNTY, FLORIDA

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FPSC-COMMISSION CLERK

Aviation Department, first requested that the Board of County Commissioners authorize execution of an agreement for the purchase or lease of telecommunications equipment. BellSouth participated in this solicitation process. See County's Preliminary Exhibit List No. 1, Resolution No. R-361-82, dated March 16, 1982, with attachments.

Objection No. 5:

BellSouth objects to the lack of an identified time period in the [County's] Requests thereby making the Requests overly broad and constituting an undue burden on BellSouth.

Response to Objection No. 5:

The County's requests are not overly broad and are related to the matters involved in this action. The specific timeframe for the responses requested is from 1982 to the present. This timeframe is appropriate because it was in 1982 that the County, through the Dade County Aviation Department, first requested that the Board of County Commissioners authorize execution of an agreement for the purchase or lease of telecommunications equipment. BellSouth participated in this solicitation process. See County's Preliminary Exhibit List No. 1, Resolution No. R-361-82, dated March 16, 1982, with attachments.

County's Specific Responses to BellSouth's  
Specific Objections to the Request

County's Request No. 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").

Specific Objection to Request No. 1:

See General Objections *supra*. To the extent this request is construed to require the production of correspondence by and between various BellSouth entities, and not between BellSouth entities and the PSC, BellSouth objects on the basis of relevance and undue burden.

Response to Specific Objection No 1:

Intra-communications between the various BellSouth entities are related to the County's telecommunications operations and are relevant to the present action.

*In re: Complaint of BellSouth Telecommunications, Inc.  
Docket No. 050257-TL  
County's Responses to Objections to First Request for Production*

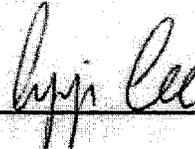
BellSouth has raised no basis for an objection based on privilege or relevance as to why the County is not entitled to such communications.

RESPECTFULLY SUBMITTED,

MURRAY A. GREENBERG  
MIAMI-DADE COUNTY ATTORNEY

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By



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[DHope@miami-airport.com](mailto:DHope@miami-airport.com)  
[DHope@miamidade.gov](mailto:DHope@miamidade.gov)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 23<sup>rd</sup> day  
of June 2006, to:

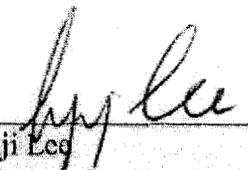
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\_\_\_\_\_  
Cynji Lee  
Assistant County Attorney