

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

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*

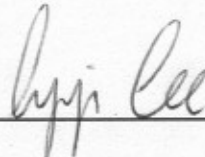
BellSouth has raised no basis for an objection based on privilege or relevance as to why the County is not entitled to such communications.

RESPECTFULLY SUBMITTED,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this *23rd* day

of June 2006, to:

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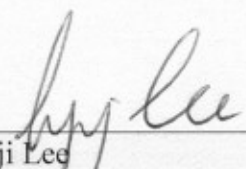
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