

**Matilda Sanders**

**From:** Griffin, Kecia (CAO) [KGRIFFIN@miamidade.gov]  
**Sent:** Monday, July 03, 2006 1:10 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** FW: Miami-Dade County Response to Staff's First Request for Production of Documents  
**Attachments:** MDC's Response to Staff's First Requestfor Production.pdf

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SEC   |    
OTH \_\_\_\_\_

July 3, 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) - TL**

Dear Mrs. Bayó:

Enclosed is an original Miami-Dade County's Responses to Staff's First Request for Production.

Copies have been served to the parties shown on the attached Certificate of Service without attachments.

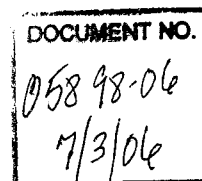
cc: All Parties of Record  
David Stephen Hope, Assistant County Attorney  
Cynji Lee, Assistant County Attorney

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**From:** Hope, David (CAO)  
**Sent:** Monday, July 03, 2006 1:00 PM  
**To:** Adam Teitzman; Cynji Lee Baptiste (Clee@miami-airport.com); Danielle C. Burt; David Stephen Hope (DHOPE@miami-airport.com); Dorian S. Denburg; Douglas E. Starcher; E. Earl Edenfield, Jr.; Griffin, Kecia (Airport); Griffin, Kecia (CAO); James Meza; Jean L. Kiddoo; Martin B. Goldberg; Sharon Liebman  
**Subject:** Miami-Dade County Response to Staff's First Request for Production of Documents

**Adam:**  
**Attached please find the County's response to Staff's First Request for Production.**

**Cordially,**  
**David Stephen Hope**  
**Assistant County Attorney**



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  
STAFF'S FIRST REQUEST FOR PRODUCTION**

Miami-Dade County (the "County"), by and through its undersigned counsel, hereby serves its answers to the Florida Public Service Commission Staff's ("Staff") First Request for Production (the "Request") and states:

1. The County answers Staff's First Request for Production, and said answers are produced for inspection and copying, pursuant to the Request.
2. Regarding Request No. 1, there is no such entity called the "MIA Hilton". The hotel located in the terminal building, and to which responsive documents have been provided is named the Miami International Airport Hotel. The entity to which Staff may have mistakenly referenced in the Request is the Hilton Miami Airport, located at 5101 Blue Lagoon Drive, Miami, Florida 33126. There is neither an ownership or operational affiliation between the County and the Hilton Miami Airport, nor any telecommunications services provided by either the County or the Miami-Dade Aviation Department ("MDAD") to the Hilton Miami Airport.
3. Regarding Request No. 2, Mindworks is owned and captured under the entity known as Stellar Partners.

4. Regarding Request No. 3, Sunglass Hut is not a shared tenant service ("STS") customer of MDAD. MDAD has provided Sunglass Hut with a copy of the Request and asked for a copy of its May 2006 telephone bill. As of the date of this response, Sunglass Hut represented: (i) BellSouth provides its telephone service(s); and (ii) it will attempt to provide an electronic copy of its telephone bill, located at the Ohio corporate offices, and which includes the location(s) at Miami International Airport. The County will forward this information to Staff as soon as practicable.

5. Regarding Request No. 4, the County's current list of customers constitutes a trade secret. § 812.081, Fla. Stat. (2005). "[T]rade secret information as defined in s. 812.081, and as provided for in s. 815.04(3), [is] expressly made confidential and exempt from the public records law ...." § 815.045, Fla. Stat. (2005). *The County's current list of customers is confidential and exempt, and is not to be disclosed to third parties or non-Florida Public Service Commission entities. See Sepro Corp. v. Fla. Dep't of Envtl. Prot.*, 839 So. 2d 781, 784 (Fla. 1st DCA 2003), review denied sub nom by *Crist v. Fla. Dep't of Envtl. Prot.*, 911 So. 2d 792 (Fla. 2005) (emphasis added).

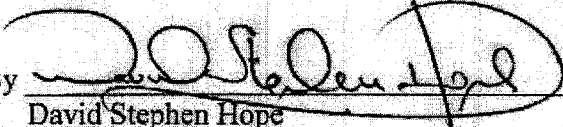
6. Regarding Request No. 5, the documents requested do not exist. Neither the County nor MDAD provide telecommunications services to entities located outside of the physical boundaries or footprint of Miami International Airport or its general aviation airports.

RESPECTFULLY SUBMITTED,

MURRAY A. GREENBERG  
MIAMI-DADE COUNTY ATTORNEY

Stephen P. Clark Center  
111 Northwest 1st Street, Suite 2800  
Miami, Florida 33128-1993  
Tel: (305) 375-5151  
Fax: (305) 375-5611

By

  
David Stephen Hope  
Assistant County Attorney  
Florida Bar No. 87718  
[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 Federal Express, this 3rd day of July 2006, to:

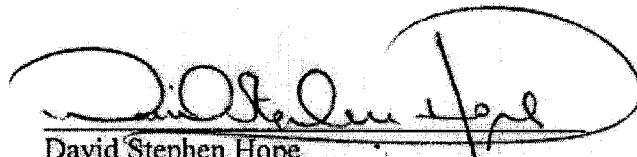
*Adam Teitzman, Esq.*  
Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

*Martin B. Goldberg, Esq.*  
Lash & Goldberg LLP  
Bank of America Tower  
Suite 1200  
100 Southwest 2nd Street  
Miami, Florida 33131-2158

*James Meza, Esq.*  
*Sharon R. Liebman, Esq.*  
c/o Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, Florida, 32301

*E. Earl Edenfield, Jr., Esq.*  
BellSouth Telecommunications, Inc.  
675 West Peachtree Street, N.E., Suite 4300  
Atlanta, Georgia 30375

*Jean L. Kiddoo, Esq.*  
*Danielle C. Burt, Esq.*  
Bingham McCutchen LLP  
3000 K Street NW, Suite 300  
Washington, D.C. 20007-5116

  
David Stephen Hope  
Assistant County Attorney