

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 Env'tl. Prot., 839 So. 2d 781, 784 (Fla. 1st DCA 2003), review denied sub nom by Crist v. Fla. Dep't of Env'tl. Prot., 911 So. 2d 792 (Fla. 2005) (emphasis added).***

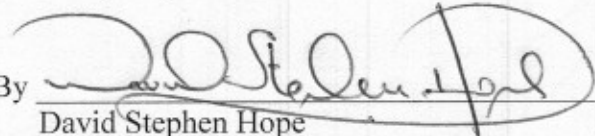
6. Regarding Request No. 5, the documents requested do not exist. Neither the County nor MDAD provide telecommunications services to entities located outside of the physical boundaries or footprint of Miami International Airport or its general aviation airports.

RESPECTFULLY SUBMITTED,

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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:

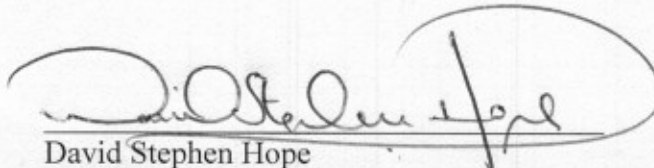
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