

Matilda Sanders

ORIGINAL

From: Fatool, Vicki [Vicki.Fatool@BellSouth.COM]
Sent: Wednesday, July 19, 2006 4:46 PM
To: Filings@psc.state.fl.us
Subject: 050257-TP BellSouth's Notice of Taking Deposition
Importance: High
Attachments: 050257-T.pdf

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CTR	<u> 1 </u>
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SCR	_____
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SEC	<u> 1 </u>
OTH	_____

A. Vicki Fatool
Legal Secretary to James Meza III
BellSouth Telecommunications, Inc.
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5560
vicki.fatool@bellsouth.com

B. Docket No. 050257-TP

Complaint by BellSouth Telecommunications, Inc., Regarding the Operation of a Telecommunications Company by Miami-Dade County in Violation of Florida Statutes and Commission Rules

C. BellSouth Telecommunications, Inc.
on behalf of James Meza III

D. 4 pages total (includes letter, certificate of service and pleading)

E. BellSouth Telecommunications, Inc.'s Notice of Taking Deposition of Miami-Dade County's Corporate Representative

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<<050257-T.pdf>>

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DOCUMENT NUMBER-DATE

06366 JUL 19 06

FPSC-COMMISSION CLERK

ORIGINAL

Legal Department

James Meza III
General Counsel - Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

July 19, 2006

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

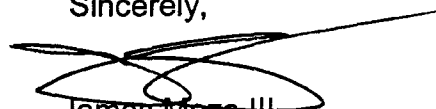
**Re: Docket No. 050257-TL: Complaint by BellSouth
Telecommunications, Inc., Regarding the Operation of a
Telecommunications Company by Miami-Dade County in Violation of
Florida Statutes and Commission Rules**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Notice of Taking
Deposition of Miami-Dade County Corporate Representatives' on August 22,
2006 @ 10:00 a.m., which we ask that you file in the captioned docket.

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

Sincerely,



James Meza III

cc: All Parties of Record
Jerry D. Hendrix
E. Earl Edenfield, Jr.

DOCUMENT NUMBER-DATE

06366 JUL 19 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth Tele-)
Communications, Inc. Regarding)
The Operation of a Telecommunications) DOCKET NO. 050257-TL
Company by Miami-Dade County in)
Violation of Florida Statutes and)
Commission Rules)

NOTICE OF TAKING DEPOSITION

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

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

Murray A. Greenberg, Esq.
Miami-Dade County Attorney
David Stephen Hope, Esq.
Assistant County Attorney
Miami-Dade County
Attorney's Office
Aviation Division
P.O. Box 592075 AMF
Miami, Florida 33159-2075

PLEASE TAKE NOTICE that the undersigned attorney will take the deposition of Miami-Dade County's designated Person or Persons With the Most Knowledge of the following:

- (1) the information contained in the Affidavit of Mark Forare submitted by Miami-Dade County in support of its Motion to Dismiss (which affiant Miami-Dade County has advised has retired and is no longer employed by Miami-Dade County);
- (2) the role, if any, of Miami-Dade County in the provision of telecommunications services to airport security; and
- (3) the role, if any, of the provision of telecommunications services in the safe and efficient transportation of passengers and freight through the airport facility at Miami International Airport.

on August 22, 2006 at 10:00 a.m. at the offices of Lash & Goldberg, LLP, Bank of America Tower, Suite 1200, 100 Southeast 2nd Street, Miami, Florida 33131. The oral examination will continue from day to day until completed. This deposition is being taken for the purposes of discovery or for such other purposes as are permitted under the rules of the

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

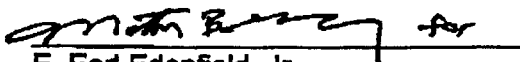
Florida Public Service Commission.

Respectfully submitted:

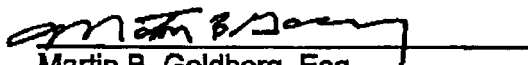
BELLSOUTH TELECOMMUNICATIONS, INC.

 for

James Meza, Esq.
Sharon R. Liebman, Esq.
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301
(305) 347-5558

 for

E. Earl Edenfield, Jr.
675 West Peachtree Street, N.E.
Suite 4300
Atlanta, Georgia 30375
(404) 335-0763

 for

Martin B. Goldberg, Esq.
LASH & GOLDBERG LLP
Bank of America Tower, Suite 1200
100 Southeast Second Street
Miami, Florida 33131
(305) 347-4040

cc: Kresse & Associates Court Reporters

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this

19 day of July 2006, to:

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

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

Murray A. Greenberg
Miami-Dade County Attorney
David Stephen Hope, Esq.
Assistant County Attorney
Miami-Dade County Attorney's Office
Aviation Division
P.O. Box 592075 AMF
Miami, Florida 33159-2075


MARTIN B. GOLDBERG