

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Complaint by BellSouth Tele-)
Communications, Inc., Regarding)
The Operation of a Telecommunications)
Company by Miami-Dade County in)
Violation of Florida Statutes and)
Commission Rules)

DOCKET NO. 050257-TL

**DEPOSITION OF PEDRO J. GARCIA
DATED NOVEMBER 3, 2006**

FINAL EXHIBIT NO. 207

23 of 29

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DOCKET NO. 050257-TL

In re: Complaint by Bellsouth Tele-
Communications, Inc., Regarding
The Operation of a Telecommunications,
Company by Miami-Dade County in
Violation of Florida Statutes and
Commission Rules

COPY

DEPOSITION

OF

PEDRO J. GARCIA

100 S.E. 2nd Street
Suite 1200
Miami, Florida

Friday, November 3, 2006
10:45 a.m. - 11:45 a.m.

A P P E A R A N C E S

1
2
3 (Telephonic)
4 Public Service Commission:
5 Adam Teitzman, Esq.
6 Dale Bys Kennedy
7 Rick Moses

8
9 For BellSouth Telecommunications:

10 MARTIN B. GOLDBERG, ESQ.
11 Lash & Goldberg LLP
12 100 S.E. Second Street
13 Suite 1200
14 Miami, Florida 33131

15 For Miami Dade County:

16 DAVID S. HOPE, ESQ.
17 Office of the County Attorney
18 111 N.W. First Street
19 Suite 2810
20 Miami, Florida 33128

21 Also Present: Dorian Denburg, Esq.
22 BellSouth, Legal Department

I N D E X

23 Witness Direct Cross
24 PEDRO J. GARCIA 3

E X H I B I T I N D E X

25 BellSouth Description Page No.
4 Garcia Affidavit 4

1 THEREUPON:

2 PEDRO J. GARCIA,

3 a witness named in the notice heretofore filed,
4 having been first duly sworn, deposes and says as
5 follows:

6 DIRECT EXAMINATION

7 BY MR. GOLDBERG

8 Q. Mr. Garcia, could you state your full name
9 and spell your last name for the record please.

10 A. Pedro J. Garcia, G-a-r-c-i-a.

11 Q. Good morning, Mr. Garcia. You're here this
12 morning, and correct me if I'm wrong, as the County's
13 corporate representative pursuant to Exhibit No. 1,
14 which is in front of you, the re-notice of taking
15 deposition. Is that correct?

16 A. Yes.

17 Q. Are you here to respond to questions in the
18 areas identified by the numbers two and three on this
19 notice?

20 A. Yes, sir.

21 Q. You've previously had your deposition taken
22 before a couple times in this case, is that correct?

23 A. Yes.

24 Q. So you're familiar with the ground rules.
25 I won't go over the ground rules but that's okay with

1 you?

2 A. I am.

3 Q. Let me just start by asking you again and
4 also for purposes of the staff just to tell us what
5 your current position is at the airport and what
6 generally your day-to-day responsibilities are?

7 A. I am chief of telecommunications, part of
8 the information systems and telecommunications
9 division. I am responsible for the operation,
10 maintenance of the telephone systems, the network and
11 P.A. system, wireless services and other
12 telecommunications infrastructure of the Miami
13 International Airport.

14 Q. Thank you.

15 I'm going to hand you what's been marked as
16 Exhibit No. 4. That is copy of your affidavit that
17 was filed attached to the County's motion to dismiss
18 before the Public Service Commission in this
19 proceeding. Is that correct?

20 A. Yes.

21 (Thereupon, Garcia Affidavit was
22 marked as Exhibit 4 for Identification.)

23 Q. Did you write this document?

24 MR. HOPE: Objection. I'm going to
25 request the deponent not answer that question

1 under attorney-client privilege and work
2 product.

3 Q. Mr. Garcia, did you prepare the initial
4 draft of this document?

5 MR. HOPE: Same objection.

6 Q. Did you sign the document, Mr. Garcia?

7 A. I don't remember honestly, but I believe I
8 must have and obviously -- yes, I see my signature on
9 the document. It's been a while.

10 Q. Do you recall where you were when you
11 signed the document?

12 A. No.

13 Q. Is the information contained within the
14 document from your knowledge and experience or a
15 compilation of your knowledge and experience and other
16 sources of information?

17 MR. HOPE: Object to form. Object to
18 any portion of the question that deals with
19 information that might have come from
20 conversations with counsel or preparation with
21 counsel.

22 MR. GOLDBERG: You can answer the
23 question.

24 A. So the information basically was signed.
25 So I basically agree with the information. I don't

1 remember exactly where it came from or who wrote it,
2 but I agree with what I signed.

3 MR. GOLDBERG: Mr. Teitzman and staff,
4 can you hear him?

5 MR. TEITZMAN: Yes, we can hear him.

6 MR. GOLDBERG: Thank you.

7 Q. Let me point your attention, Mr. Garcia, to
8 paragraph No. 6 of the affidavit, the last paragraph
9 and I'm going to read to you the first sentence. That
10 sentence says, "MDAD operates the Shared Airport
11 System to maximize the safety and security of the
12 traveling public."

13 Did I read that correctly?

14 A. Yes, sir.

15 Q. Since you just stated that you agreed with
16 the information in this affidavit when you signed it,
17 can you detail for us each and every reason or fact
18 that supports this statement?

19 A. The shared tenant services system allows
20 the users or the tenants that use that service to have
21 telephone service from the two telephone switches that
22 the airport operates. By having their service from
23 those telephone switches, the tenants and the airlines
24 and everybody that uses the system can call each other
25 and call the airport emergency services by dialing

1 four digit number instead of having to dial ten digits
2 if they were on an outside service line.

3 When they do that, the telephone switch
4 provides the entity receiving the call with the ALI or
5 letter case identification where the call is coming
6 from.

7 That means, for example, all the counters
8 at the airport where the airlines do their business,
9 the gates, where the planes leave from, they all have
10 a County system or airport system telephone in there.
11 If it's an emergency at any location and somebody
12 picks up the phone and calls the police department of
13 the airport or the operation control room or the fire
14 department, they will get a location identification on
15 their telephone exactly where the call is coming from.
16 So even though the caller cannot identify where he is,
17 the person receiving the call will be able to tell
18 where exactly where they are by doing that.

19 If they will be using a regular BellSouth
20 or any other vendor, any other provider's line, that
21 would not be the case. They would be dialing 911 and
22 the 911 operator would get as caller identification
23 location the telephone room or the terminal. They
24 would not know where the call is coming from.

25 If the caller doesn't know where he is,

1 they would have to call the police at the airport and
2 try to get as much information from the caller, as
3 much information as possible to figure out where the
4 emergency is taking place. That is the main feature.

5 Of course, everybody that works at the
6 airport has a badge. On the back of the badge the
7 number of the police, fire, operation control room.
8 So they can dial the four digits and get that location
9 where they are calling from immediately forwarded to
10 those three entities.

11 In addition to that, the phone system
12 allows the users to do -- basically use all the
13 features of the PBX which means they can forward
14 calls, they can have conference calls to anybody
15 that's in the system and anything that would be
16 required without having to pay extra for it or having
17 predetermined like in the case of an outside provider
18 would be. Everybody that's on the system can use
19 those features. Those are the main two reasons why I
20 feel that telephone system basically provides
21 additional security for the airport.

22 Q. You used the term two. Can you just really
23 short, succinctly so I know one and two, what are the
24 two reasons? First is what and second is what?

25 A. One is be able to use immediate location

1 identification by dialing four digits to any emergency
2 center for police or fire.

3 The other one is by having features of the
4 system available like conference calling or call
5 forwarding all the features available on the switch.

6 Q. Let's talk about point No. 1 you raised.
7 Are there any other reasons that you're aware of and
8 that supported your statement in paragraph six,
9 sentence one of your affidavit?

10 A. I can't think of anything else at this
11 point.

12 Q. When we talk about Point 1, four digit
13 dialing, would you agree with me that that is a
14 product of the County's telephone system that is
15 behind the switch, behind the PBX, that capability to
16 interconnect with other tenants at the airport through
17 the four digit dialing?

18 A. No, that is a capability of the PBX.

19 Q. So are you disagreeing that that is a
20 feature, that is a capability that is in that
21 terminology, behind the PBX switch?

22 MR. HOPE: Object to form.

23 A. I'm not sure what you mean behind PBX.

24 Q. Let me -- maybe I'll drop that from my
25 question.

1 Would you agree that's sort of an internal
2 communication function at the Miami International
3 Airport between tenants?

4 A. Yes.

5 Q. And to internally communicate would not
6 require any telephonic communications that goes out in
7 front of the PBX switch or out to any network access
8 whether it be local or long distance?

9 A. Okay. When you say "in front," you're
10 talking about the public network side?

11 Q. Correct.

12 A. That is a function of the PBX on the
13 internal side of the PBX.

14 Q. Now not all tenants at the airport or
15 customers at the airport are on Miami-Dade County's
16 STS system, is that correct?

17 A. That is correct.

18 Q. Since you're citing that the four digit
19 capability is one of the principal reasons that the
20 airport system maximizes the safety and security of
21 the traveling public as stated in your affidavit, are
22 the non-Miami STS customers at a disadvantage when it
23 comes to safety and security?

24 A. They could be.

25 Q. Could you explain that please?

1 A. Because they don't have the features that I
2 explained before to be able to dial four digits and
3 get their location identified by the phone system to
4 the emergency responders, and they would have to dial
5 911 through the public network. And 911 operator
6 would get as the location identification the telephone
7 room of the terminal, which is not representative of
8 what the person is calling from. And they would have
9 to know where they are and tell the 911 operator where
10 they are and that would in turn be related to the
11 police and fire or anybody that would respond to the
12 emergency.

13 Q. Let me ask you this question. That is when
14 you print these badges and you give the badges out to
15 all the individuals that work at the airport and it
16 has the four digit dialing, what is done to train or
17 assist non-Miami STS customers to get as rapid a
18 response from 911 or fire and rescue as possible?

19 A. Okay. The badge doesn't contain four digit
20 numbers. It contains a ten digit number that people
21 know that the four digits is what you need to do to
22 call internally. You can also dial the ten digits or
23 you can dial 911. You could do anyone of those
24 things.

25 Q. Okay.

1 A. The badge is when there is what we call
2 SIDA, ID required area class that everybody has a
3 badge needs to take. It's been a while since I took
4 that, but I believe they discuss everything that's in
5 the badge including the fact that you got emergency
6 numbers in the back of the badge if you need to use
7 it.

8 Q. So just to be clear, I guess all the
9 individuals that work at the airport when it comes to
10 being trained about safety and security are provided
11 with a ten digit number not the four digit, is that
12 correct?

13 A. They are provided a number anywhere -- they
14 are provided a ten digit number. Anybody that works
15 in a big organization knows that internally you
16 communicate with four digit dialing. That's the
17 advantages of having an internal system.

18 Q. Do you believe that the difference between
19 dialing a ten digit number versus a four digit number
20 is a security threat or disadvantage in anyway, shape
21 or form?

22 A. I believe it is because it's easier like I
23 said, knowing exactly where you are it's a big deal
24 when you need somebody to respond right away.

25 Q. Well, let me breakdown that answer. First

1 let me focus on the time it takes to call the security
2 operations at the airport, the difference between
3 dialing a four digit extension and a ten digit
4 extension. Do you believe that that is a safety
5 disadvantage or hindrance?

6 A. It's a few seconds more. But that's not
7 the main issue. To answer your question, it's a few
8 seconds more but there is more to it than that.

9 Q. The more to it than that gets to the caller
10 ID issue?

11 A. Right.

12 Q. Let me focus on that now.

13 A. Okay.

14 Q. When a Miami STS customer uses the four
15 digit dialing, what shows on the caller ID at the
16 airport operations center?

17 A. It shows the location where the call is
18 originating from. For example, if you're in an
19 airline counter, it would show, as we say Terminal A
20 and then it would have a number on the counter which
21 is composed of the floor, the Concourse H or G or B
22 and then the number of the counter specifically. So
23 • the emergency responders, just by having that number
24 they know exactly which counter they are calling from.

25 Q. I want you to be more specific so we have a

1 very good record. When a Miami STS customers dials
2 internal four digit number, the location comes up.
3 Does any other information come up? Does the
4 originating entity comes up? If it's Kerry's Ice
5 Cream for example?

6 A. Let me qualify my previous answer. I was
7 talking about the airlines themselves. Those are not
8 really STS customers because those phones are in every
9 counter of the airport whether the airline is a STS
10 customer or not. So there is two situations here.

11 Every counter at the airport has a County
12 phone able of dialing the four digits and get all the
13 information I described. Every gate has it. The
14 concessions only the ones that pay to be STS customers
15 have the County phones. So I cannot tell exactly how
16 it's described, but it's described on the concourse
17 and I believe it would show the name of the entity.
18 Just like it would show the name of a person when I
19 call from my office people see Pedro Garcia calling.

20 Q. Picking up on your testimony, there are
21 County phones that have full caller ID features that
22 are not part of the STS system that are spread
23 throughout the airport, is that correct?

24 MR. HOPE: Object to form.

25 A. All County phones are located in all the

1 counters of the airlines and all the gates. It's just
2 a phone that if you want to dial outside you dial nine
3 first. If you want to dial four digits, you dial the
4 four digits.

5 Q. That can be available to anybody in the
6 airport that needs to use it for an emergency?

7 MR. HOPE: Object to form.

8 A. It's available to all the airline employees
9 or anybody, I guess, in an emergency you can get
10 behind the gate counter and use it if you're a public
11 person that you can dial four digits. Mostly it's for
12 the use of the airlines and the people that process
13 passengers.

14 Q. Now let me focus on the current Miami-Dade
15 STS customers such as the restaurants, concessions and
16 so forth and I will refrain from taking out the
17 customer list and identifying particular ones because
18 that's been designated confidential but I think you'll
19 understand the context of my question.

20 So related to the Miami STS customer who
21 are on the STS system, when they dial their four digit
22 extension to get to the Airport Operations Center if
23 they have an emergency, what comes up with respect to
24 their caller ID?

25 A. It should be the name of the entity that's

1 calling, whatever, ABC Toys or XYZ Ice Cream or
2 whatever.

3 Q. Is any other information there? Is the
4 location there?

5 A. The phone number.

6 Q. Just the phone number. The name of the
7 originating entity and phone number, is that correct?

8 A. Right.

9 Q. If that same Miami STS customer were to
10 dial the ten digit number that was on their badge to
11 get response for an emergency, what caller ID
12 information would come up in that instance?

13 A. It would be just the telephone number.

14 Q. But not the originating entity?

15 A. Right.

16 Q. If a non-Miami STS customer such as one
17 serviced by BellSouth were to call the ten digit
18 number on their badge, what information would come up?

19 A. I'm sorry. Repeat the question again.

20 Q. Sure. If a non-Miami Dade County STS
21 customer, that is one that is receiving telephone
22 service from BellSouth or another provider calls the
23 ten digit number that's on their Miami airport badge
24 for emergency response, what information would show up
25 on the caller ID at the Airport Operations Center?

1 A. For sure the telephone number. I would
2 have to say probably whoever is paying for the bills
3 of that telephone. Just like when you call your
4 house, you know, you have your name and it shows on
5 the telephone number if you have the feature to
6 receive it or put it out there.

7 Q. How does the airport operations center
8 locate where that telephone number is when this number
9 comes up on the screen?

10 A. Let me go back to something here. The STS
11 tenants at the airport, I believe the location is also
12 shown for the STS tenants. It's not shown when you
13 dial the ten digits. Just like we have the location
14 of the counter and whatever is shown there.

15 If you dial the ten digits, there is the
16 location -- the name of the entity that calls in
17 addition to the telephone number. So Operations
18 Control Center, they have a list of where everything
19 is at the airport in case of emergencies. So does
20 police and fire. They will determine that way I would
21 imagine where to go.

22 Q. So getting back to your principal reason,
23 that being, you know, that you have stated it
24 involving the caller ID, is it correct that based upon
25 your testimony here today the distinction between a

1 Miami STS customers calling for emergency response and
2 a non-Miami STS customer calling for emergency
3 response is the appearance of the location on the
4 caller ID but nothing else?

5 MR. HOPE: Object to form.

6 A. The location is the difference, yes.

7 Q. Is there any other difference?

8 A. Not that I can think of, no.

9 Q. How long have you been in your position or
10 working at the Miami International Airport?

11 A. About five years.

12 Q. In your current position, correct?

13 A. Yes.

14 Q. Then you've been at the airport --

15 A. Five years.

16 Q. Just five years?

17 A. Yes.

18 Q. In the last five years, let me limit my
19 question that way, has this distinction in terms of
20 the location appearing for an STS customer but not
21 appearing for a non-Miami-Dade County STS customer
22 ever been addressed or raised as a security issue?

23 A. Raised? Are you saying about being used or
24 being in effect? Actually being used by police and
25 fire? I don't understand.

1 Q. Has this distinction ever been addressed by
2 the airport as being a security issue or concern?

3 A. Well, it's something that is there. I'm
4 not sure that it would need to discuss the feature
5 itself. Everybody knows that it exists and it's taken
6 as face value that is there.

7 Q. Are you aware as to whether or not there
8 has ever been a difference in the form of emergency
9 response to a Miami STS customer versus a non-Miami
10 STS customer at the airport?

11 A. I am not in the loop of the emergency
12 response systems so I don't know how they respond or
13 how quickly or whatever emergency happen at the
14 airport. Sometimes I hear about it on the new rather
15 than being there because I'm not even in the terminal
16 building. So I'm not aware of every emergency and how
17 it's responded to.

18 Q. But Mr. Garcia, in your position out at the
19 airport, wouldn't you expect, sir, that if there was a
20 problem with the response that was generated because
21 of a telecommunications issue, that that would be
22 brought to your attention?

23 A. No.

24 MR. HOPE: Object to form.

25 Q. I'm sorry?

1 A. No, I wouldn't expect that.

2 Q. Tell me why you would not expect that
3 telecommunications issue would not be brought to your
4 attention?

5 A. Because that issue is not a technical issue
6 and I'm only responsible for technical issues as far
7 as that goes. Once the capabilities available to the
8 user, that would be more a police matter or a fire
9 matter to decide that. Whether they responded a
10 little too late or sooner, that's an operational issue
11 of those emergency responders. It's not a technical
12 issue.

13 Q. Is it your testimony, sir, here today that
14 the telecommunication facilities' capability to
15 provide certain information via a caller ID at the
16 airport is not a technical telecommunications issue?

17 A. It is a technical issue as far as
18 establishing the capability. Once the capability is
19 established and available, my duties drop off. Then
20 there is the problem of the user using those
21 capabilities.

22 Q. Would you agree with me that had this issue
23 been raised with you prior at anytime prior to today,
24 that there are telecommunication products on the
25 market that could level the playing field so to speak

1 and provide the location from a caller ID perspective
2 for non-Miami STS customers?

3 MR. HOPE: Object to form.

4 A. There are such things available and not --
5 everybody is aware of those things for many years.
6 However, there is some problem associated with that.
7 Even the County in general or the airport, it's been
8 decided many years ago that would not be the way to
9 go.

10 Q. Tell me first of all what products would
11 solve that problem?

12 A. It's basically a database.

13 Q. Let me just rephrase the question. Would
14 solve that distinction as you've alleged it?

15 A. There is a system that could be purchased
16 that it would be connected to the PBX with a database
17 that would identify every single telephone that serves
18 out of the PBX with the specific location of that
19 telephone. However, the problems with that is that
20 database has to be maintained by the entity that owns
21 the PBX and there is some liability issues associated
22 with that that any big organization, people --

23 The problem exists in college campuses, in
24 the Downtown government area. If you call anywhere in
25 the Downtown buildings 911 you're going to be sent to

1 the telephone room in the bottom of the library.
2 You're not going to be told go to the 12th floor of
3 the Metro-Dade Center.

4 We looked at that thing when I was on the
5 County 15 years ago and the problem was there even
6 when 911 was established that there would be an issue
7 with keeping that database accurate. That is the
8 problem. If you provide the wrong information to the
9 911 responder, it would not be a good deal for the
10 person calling and the responder. So that's why it
11 has not been implemented.

12 Q. So is it fair to say that the airport has
13 taken no affirmative action to address the distinction
14 that you have raised today in caller ID information
15 between a Miami STS customer and a non-Miami STS
16 customer?

17 MR. HOPE: Object to form.

18 A. County has taken that position not to do
19 that in general.

20 Q. Are you --

21 A. We're part of the County.

22 Q. Are you drawing a distinction between the
23 County and you?

24 A. I'm saying we are a department of the
25 County. So that's the position of the County.

1 Q. Just to be clear, have you on behalf of the
2 airport ever saw fit to take any action to address the
3 distinction that you have raised in this caller ID
4 area?

5 A. On behalf of the airport I was involved in
6 that some years ago and the County, like I said, has
7 taken that position and it's not been brought up
8 again.

9 Q. You also raised in your testimony as a
10 reason why the shared airport system purportedly
11 maximizes the safety and security of these issues or
12 features involving conference calling and call
13 forwarding.

14 First of all, let me ask you from a
15 technical perspective, are those STS features as you
16 understand them?

17 A. They are available to any phone working out
18 of the switch that belongs to the airport. Anybody,
19 whether you're STS or MDAD employee, it's available to
20 anybody that uses the airport system.

21 Q. Can you detail for me please any instance
22 from your knowledge or experience where, you know,
23 call forwarding has maximized the safety and security
24 of the traveling public out at Miami International
25 Airport?

1 A. Call forwarding is like I said, it's a
2 combination of all the features available on the PBX
3 including conferencing. That's the main issue. And
4 call forwarding could be voicemail, all those features
5 available in the system by the folks that takes care
6 of those things. I, again where talks about the user
7 now, the security people, police, fire. I'm not one
8 of those people. I'm the technical person that makes
9 those features available for them to use.

10 Q. Let me ask the question again. Based on
11 your knowledge and experience out at the airport and
12 your position as corporate representative of
13 Miami-Dade County, can you identify for me any
14 instance in which call forwarding or conference
15 calling or any of the features you just referenced has
16 maximized the safety and security of the traveling
17 public at the Miami International Airport? I would
18 like you to answer yes or no and then you can explain.

19 A. I can not answer yes or no. I know that
20 sometimes conference calls have been used when some
21 things have happened, they have to get several people
22 talking at the same time. But I have not been part of
23 this conference. I cannot tell you anymore about it.
24 In conversation I've heard that. But I don't have
25 firsthand experience of that issue.

1 Q. Do you have any other information to answer
2 that question with?

3 A. No.

4 Q. Has the Miami International Airport ever
5 considered placing four digit dialing, just the
6 internal ability to communicate, amongst the various
7 tenants at the airport? Has the airport, Miami
8 International Airport, ever considered placing that
9 capability with all tenants at the airport including
10 the shops, restaurants, et cetera?

11 A. No.

12 Q. From a technical standpoint, Mr. Garcia,
13 which is in your bailiwick, would you agree that that
14 would be possible?

15 A. No, because it's not allowed by the PSC to
16 have those kind of phones everywhere. You can't force
17 the people to have phone service that they don't want
18 to pay for or that would allow them to make phone
19 calls that -- they have a choice to pick any system
20 they want or any vendor or any provider they want.

21 Q. That's your understanding of the PSC
22 position on that issue, is that right? Where do you
23 get that understanding from?

24 A. We can not force any tenant to have phone
25 service provided by the airport. They can choose any

1 vendor they want.

2 Q. I understand that. I guess going back to
3 my initial question which you have answered that the
4 airport has never considered or it's even been raised
5 from a security standpoint or safety standpoint of
6 providing all the tenants at the airport at least with
7 this internal four digit capability?

8 MR. HOPE: Object to form.

9 A. No. We have not considered doing that.

10 MR. GOLDBERG: Mr. Teitzman, I'm just
11 going through my notes so I apologize for the
12 delay.

13 MR. TEITZMAN: No problem.

14 Q. Mr. Garcia, let me continue with a couple
15 of other questions and areas. If I could ask you to
16 look at again paragraph 6 of your affidavit preceding
17 the last sentence and let me read it to you. "In
18 addition, telephone calls placed over the airport
19 system are not subject to cable cuts and switch
20 overloads that might occur on a public switched
21 network." Can you explain that statement for us
22 please?

23 A. Sure. The telephone -- every phone at the
24 terminal is connected to the PBX owned by the airport
25 and connection is internal in the building itself.

1 When you place calls to the public network, in
2 addition to that connection, you have to have cables
3 that go under the streets and whatever, all the way to
4 the provider's central office, in this case would be
5 BellSouth and that increases the risk of construction
6 demolishing.

7 Right now maybe we've had cable cuts, even
8 power cable cuts and that is a risk that would be
9 inherited -- the longer the distance you have to
10 travel to the source, the more risk of having cuts
11 happening.

12 Also the other part of the statement is,
13 for example, during Hurricane Andrew having no dial
14 tone because everybody was calling on the phone. By
15 having an internal switch, we're not subject to that
16 by having to compete with everybody else for dial
17 tones. People can call each other within the airport
18 by using the internal switch.

19 Q. So as we understand it or I understand it,
20 correct me if I'm wrong, this statement goes just to
21 telephone calls placed utilizing the four digit number
22 capability, is that correct?

23 MR. HOPE: Object to form.

24 A. Correct.

25 Q. Just to ask a followup question. The

1 number on the Miami International Airport badges that
2 are given out to everybody at the airport to call in
3 case of an emergency response, that's a ten digit
4 number, correct?

5 A. Correct.

6 Q. Can you tell me from a technical
7 perspective what happens, where does that call go when
8 that Miami airport person calls that ten digit number?

9 A. If you're not on the airport system and
10 you're forced to call the ten digits, you will go no
11 where if there is a cable cut. That's the bottom
12 line.

13 Q. So is it your testimony that if you are on
14 the Miami STS system and you call the ten digit number
15 you're still -- do you go out in front of the PBX or
16 it stays internally?

17 A. It doesn't go anywhere. You have to -- it
18 just doesn't go anywhere. It will point you to the
19 central office, which will be interrupted by the cable
20 cut. You would have to know to dial the four digits,
21 which if you're internal at the airport you would know
22 that.

23 Q. But again it appears, correct me if I'm
24 wrong, that this issue that you have raised in the
25 affidavit before the Florida Public Service Commission

1 has not risen to the level of a concern with the Miami
2 International Airport for the airport to consider a
3 fix to this issue?

4 MR. HOPE: Object to form.

5 Q. Because the airport has never considered --
6 well strike that.

7 Has it ever been addressed in terms of
8 attempting to fix this issue?

9 A. I'm not sure how can you fix preventing a
10 cable cut. We do have -- we pay extra for having
11 BellSouth provide a ring around that provides
12 communication on both ways in case of one side doesn't
13 work you go to the other. So we are doing everything
14 we can.

15 However, any time you go out on the streets
16 you can have a problem. It's not a hundred percent.
17 There is some areas are common to even for the ring.
18 You minimize it but the longer the distance you have
19 to travel, again the more chances of having cable
20 cuts. That's a way of life everywhere.

21 Q. If I could direct your attention to Exhibit
22 No. 2, which is towards your right underneath exhibit
23 No. 1 I think, if I could ask you to look at that
24 document please.

25 A. Yes.

1 Q. I'm sorry, Exhibit No. 2.

2 A. Talking about this?

3 Q. Yes. Exhibit No. 2. Take a second to look
4 at that document. I have a couple questions for you.

5 A. Okay.

6 Q. Have you seen that document before?

7 A. Never.

8 Q. I need to ask these questions I apologize
9 but can you tell me in any way, shape or form who
10 compiled that document?

11 A. I don't know.

12 Q. Do you have any personal knowledge of the
13 various incidents that are detailed on that document
14 in terms of times whether the concourses need to be
15 shut down or evacuated?

16 A. No, I don't.

17 Q. Can you describe for us the role of the STS
18 system, if any, in any of the incidents outlined on
19 that document, Exhibit 2?

20 A. I can only reiterate what I have already
21 said that in the reporting of these incidents, the
22 fact that the County phone was available from the
23 airport system could have made it faster to respond to
24 these incidents. I don't have first knowledge of how
25 it was responded or who called or anything.

1 Q. That's what I want to be clear on.
2 Hypothetically all those indents could have been
3 directed to the Airport Operations Center by a
4 non-Miami STS customer from your knowledge, correct?

5 MR. HOPE: Object to form.

6 A. It could have been.

7 Q. Let me ask you this, Mr. Garcia. In your
8 capacity as Miami-Dade County corporate representative
9 here today for areas two and three in the notice, if
10 the Public Service Commission were to find that the
11 STS operation operated by Miami-Dade County at the
12 airport were to require certification, would that in
13 any manner in your view negatively impact the County's
14 ability to provide safe and efficient transportation
15 for the passengers at the airport?

16 A. To me this would be an administrative
17 issue. It would not be anything requiring technical
18 changes to whatever is going on now.

19 MR. GOLDBERG: Mr. Hope, Mr. Teitzman,
20 we're going to take a couple minute break if
21 that's okay with you. I may not have any
22 further questions.

23 MR. TEITZMAN: That's fine with the
24 Commission.

25 MR. GOLDBERG: Okay. Thank you.

1 (Recess in Proceedings.)

2 Mr. Teitzman, we're going to continue
3 on just for brief followup questions, so we're
4 back on the record.

5 Q. Mr. Garcia, are you prepared to continue
6 with your deposition?

7 A. Yes, sir.

8 Q. Just to remind you as I always do you're
9 still under oath.

10 Let me go back to an area that I just want
11 to sort of clarify our understanding of based upon
12 your testimony. You testified earlier that in
13 addition to phones that are provided to Miami-Dade STS
14 customers, there are other County phones that are
15 located, I believe you said, at the various airline
16 counters and the airline gates I suppose. I want to
17 just ask you some questions about those phones if you
18 don't mind.

19 A. Okay.

20 Q. What is the purpose of those phones?

21 A. We feel that in the interest of security of
22 the airport there should be a County phone at every
23 location that is used for the passengers, like all the
24 check-in counters and all the gates.

25 Also it's a practical matter to avoid

1 duplication of telephones, different types and we have
2 something it's in common use to make the airport
3 operate more efficiently, we have a system also it's
4 called CTUE, Common Terminal Use Equipment, that
5 basically allows airlines theoretically you could have
6 them in one counter one day and next counter next day
7 if you need to shuffle things around without having to
8 move anything physically just by logging into the
9 system and allowing everybody to have a phone that
10 they can use instead of having proprietary equipment
11 which would have to be moved around to make phone
12 calls.

13 Q. With respect to the phones that you
14 identified that are at these counters and the
15 airlines, I believe you testified earlier that they
16 are hooked into the STS system, is that correct?

17 A. No. Well, they are hooked into the
18 telephone system of the airport, the one that belongs
19 to the County. STS is service that people pay to have
20 that hookup. But in this case they don't pay
21 anything. It's part of the airport infrastructure.

22 Q. So the airport pays for these phones?

23 A. Yes.

24 Q. Those phones are located, can you just list
25 out the areas again?

1 A. All check-in counters and all the gates.

2 Q. How about are the phones located in any
3 cargo areas?

4 A. They could be. Yes, there are phones
5 located on the walls in some places, some strategic
6 places. I can't tell you exactly where they are. But
7 overall they are mostly in the counters and the gates.

8 Q. The County pays for these phones to be
9 available, correct?

10 A. Yes.

11 Q. And again, the purpose is for safety and
12 security?

13 A. Safety and security and also for
14 operational savings by not having to move things
15 around when you have -- have to move airlines for one
16 reason from one counter or another or you have
17 construction and you need to relocate the airlines.
18 More efficient use of the counter space and gates.

19 Q. Approximately how many phones, sir, do you
20 think are currently located at the Miami International
21 Airport as we sit here today, these type of phones, of
22 course.

23 A. I don't have the number, but there are a
24 lot. Could be certainly over hundreds if not over a
25 thousand. There is a significant number.

1 Q. Are any of these phones located in the
2 restaurants or mall shopping locations?

3 MR. HOPE: Object to form.

4 A. No. They are located at -- well, they
5 could be if the shop is a STS customer. If not, there
6 wouldn't be any County phones in there.

7 Q. My question is limited to the County
8 phones. Are these County phones that you are
9 referencing, are any of them located where the
10 restaurants are, the shops, concessions?

11 A. There are phones that are located
12 throughout the terminal called paging phones. They
13 are white and therefore used for anybody that wants to
14 call OCR to have paging happening, but they would not
15 be inside the shops unless they are an STS customer.

16 Q. Can you tell me why they are not inside the
17 shops?

18 A. Because they are not paying for them. The
19 airport needs to control expenditures.

20 MR. GOLDBERG: I don't have any further
21 questions, Mr. Hope and Mr. Teitzman. One
22 second please.

23 I'm sorry. I don't have any further
24 questions. Mr. Teitzman, does the staff have
25 any questions for Mr. Garcia?

1 MR. TEITZMAN: No, we do not.

2 MR. GOLDBERG: Mr. Hope, do you have
3 any questions?

4 MR. HOPE: No, not at all.

5 MR. GOLDBERG: Let me just clarify for
6 the record Mr. Hope since you're not asking any
7 questions at deposition, I just want to confirm
8 that there would be no other testimony or
9 affidavits or anything provided by Mr. Garcia at
10 a later date in this proceeding, is that
11 correct?

12 MR. HOPE: No other testimony in terms
13 of deposition. We don't plan on deposing him.

14 In terms of affidavits, I don't know if
15 based upon whatever pleadings we have to file
16 down the road if the pleading can have an
17 affidavit and if indeed we feel that there might
18 be an affidavit that's necessary to flush out a
19 position. That's the only way I could answer
20 that question.

21 MR. GOLDBERG: I just want to make sure
22 we're on the same page in terms of the procedure
23 here.

24 One of the next things we're going to
25 have to do in this proceeding is to file our

1 final exhibit list, and I just want to make sure
2 we don't see an affidavit. Instead of
3 questioning him here today, we see some
4 supplemental testimony.

5 MR. HOPE: In terms of the exhibit
6 list, it's just going to be exhibits that we've
7 gone through this normal procedure. Any
8 affidavit you might find from Mr. Garcia or
9 anybody else could only conceivably be, and I'm
10 saying hypothetically in terms of the pleadings
11 that are going to be filed down the road,
12 outside of this discovery period.

13 MR. GOLDBERG: All right. Thank you
14 for that clarification. I think we can adjourn
15 the deposition and before we do that, ask
16 Mr. Hope if you could advise your client or
17 maybe you've already spoken to them about
18 whether they want to waive reading or read the
19 transcript.

20 MR. HOPE: We're going to read the
21 transcript and order the transcript.

22 MR. GOLDBERG: That goes for Ms. Stover
23 as well for record purposes?

24 MR. HOPE: That is correct.

25 MR. GOLDBERG: Mr. Teitzman and other

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members of the staff, is there anything else that you would like to raise or discuss or put on the record in anyway?

MR. TEITZMAN: Not for the record, no.

MR. GOLDBERG: I can ask the court reporter to end the proceeding now and then if there is anything else you want to talk about, we're here.

(Thereupon, the deposition was concluded)

PEDRO J. GARCIA

Sworn to and subscribed before
me this _____ day of _____, 2006.

Notary Public in and for
the State of Florida at Large.

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CERTIFICATE OF COURT REPORTER

STATE OF FLORIDA:

SS.

COUNTY OF BROWARD:

I, Carla D. Smith, RMR and Notary Public in and for the State of Florida at Large, do hereby certify that I was authorized to and did stenographically report the deposition of PEDRO J. GARCIA a witness called by BellSouth in the above-styled cause; that the witness was first duly sworn by me; that the reading and signing of the deposition were waived by the witness; that the foregoing pages, numbered 1 to 40, inclusive, constitute a complete record of my stenographic notes.

I further certify that I am not an attorney or counsel of any of the parties, nor related to any of the parties, nor financially interested in the action.

Dated this 10th day of November, 2006.

Carla D. Smith

CARLA D. SMITH, RMR
Notary Public - State of Florida

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CERTIFICATE - REPORTER NOTARY OATH

THE STATE OF FLORIDA)
COUNTY OF BROWARD)

I, Carla D. Smith, RMR and Notary Public for
the State of Florida, certify that PEDRO J. GARCIA
personally appeared before me and was duly sworn.

WITNESS my hand and official seal this 10th
day of November, 2006.

Carla D. Smith

CARLA D. SMITH, RMR
Notary Public - State of Florida
Commission No. DD 427296
Expires: June 2, 2009



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No.: 050257

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)

MIAMI-DADE COUNTY'S NOTICE OF FILING AFFIDAVIT OF PEDRO J. GARCIA

Miami-Dade County (the "County"), by and through its undersigned counsel, pursuant to Fla.R.Ct. P. 1.510(C), gives notice of filing the affidavit of Pedro J. Garcia. This affidavit is in support of its Motion to Dismiss filed in response to the Complaint by BellSouth Telecommunications, Inc. ("BellSouth").

Respectfully submitted,

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Miami-Dade County Attorney
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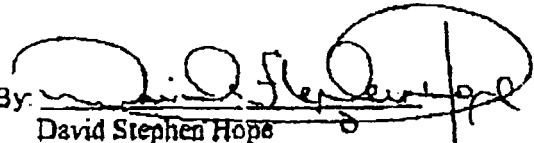
By: 
David Stephen Hope
Assistant County Attorney
Florida Bar No. 87718

EXHIBIT
4
11-3-06 CS

AFFIDAVIT OF PEDRO J. GARCIA

STATE OF)
)SS
COUNTY OF)

BEFORE ME, the undersigned authority, personally appeared PEDRO J. GARCIA, who after being duly sworn, deposes and says.

- 1 My name is Pedro J. Garcia. I am the Chief of Telecommunications, Information Services and Telecommunications Division ("IST") for the Miami-Dade County Aviation Department ("MDAD"). MDAD is responsible for the management and operation of the Miami-Dade County (the "County") airport system, which includes Miami International Airport ("MIA"). My primary responsibilities are to supervise: (i) the provision of telecommunication services by BellSouth, or comparable entities to MDAD, (ii) the leasing of equipment and facilities to MIA tenants; (iii) the provision of network connectivity and data network services to MDAD personnel and MIA tenants; and (iv) the provision of shared tenant services ("STS") to MIA tenants. I have held this position for four (4) years and have worked for the County in various telecommunications related positions for fifteen (15) years.
- 2 IST provides continuous, timely, and cost effective information technology and telecommunications services to MDAD and the airport system's diverse user base. IST supports approximately 2700 users which includes MDAD personnel, tenants, consultants, and management companies located at the MIA airport campus.
- 3 With respect to MDAD's provision of telecommunications services the County owns and operates through MDAD two (2) PBX switches (the "Airport System"), one of which has been partitioned to provide service to the MIA Airport Hotel (the "Hotel System"). In 1982, the County leased the switches with associated telephone handsets, cables, software, and equipment from Centel Communications Company ("Centel"), and Centel managed both

telecommunications systems on a contract basis. The County purchased the Hotel System on October 7, 1987, and the Airport System on February 5, 2002. The Hotel System is served on a fully partitioned basis, and is not part of the shared Airport System. The trunks used to provide the MIA Airport Hotel with telephone service are a separate trunk group, and not shared with other MIA tenants. MDAD leases the trunks which serve the Hotel System from AT&T, and the trunks which serve the Airport System from BellSouth. There is no ability to intercommunicate between guest rooms at the MIA Airport Hotel and other MIA tenants "behind" the switch, without accessing the local exchange company ("LEC") central office. BellSouth provides MDAD and the MIA tenants on the Airport System, with dial tone for local service for the Airport System. MDAD pays BellSouth over \$630,000 annually for local service, trunks, and other equipment, services, and access necessary for MDAD to provide the Airport System.

4. MIA tenants on the shared Airport System lease equipment, cable facilities, and fiber optics from MDAD for network connectivity within MIA. The leased equipment allows MIA tenants to connect with: (i) MIA tenants on the Airport System, MDAD, FAA, TSA, INS, Customs, MIA police, fire rescue, security, or other emergency personnel by dialing a four (4) digit number; and (ii) BellSouth facilities, which connects to the public network, for local service by dialing an eleven (11) digit number (9 + area code + telephone number).
5. MIA tenants may purchase telephone services, systems, and equipment directly from BellSouth or any competitive local exchange company, for any telecommunications service, including local service. When an MIA tenant does not use the MIA shared tenant services ("STS") system, that tenant is not able to connect with MIA tenants on the Airport System, MDAD, MIA police, fire rescue, security, or other emergency personnel by dialing a four (4) digit number. In order to call to these airport emergency services, a tenant not on the STS

system would need to dial the telephone number and would be connected through Bel South's local exchange network.

6. MIA AD operates the shared Airport System to maximize the safety and security of the traveling public. Because the shared system allows emergency and security personnel to immediately identify the originating entity and telephone extension of any call made on the Airport System, MIA is better equipped to address emergencies and other dangerous situations. Any MIA tenant which is not part of the shared Airport System does not have the ability to reach MDAD, MIA police, fire rescue, security, or other emergency personnel on a four (4) digit basis in emergency situations. In addition, telephone calls placed over the Airport System are not subject to cable cuts and switch overloads that might occur on a public switched network.

Docket No. 050257
Page 5.

FURTHER AFFIANT SAYETH NAUGHT.

Pedro J. Garcia
Pedro J. Garcia

Sworn to and subscribed before me at Miami, Miami-Dade County, Florida this 27th
day of May, 2005, by Pedro J. Garcia

Who is personally known to me

Who produced identification: _____
Type of identification

Elena Jovanov
Signature of Notary Public
State of Florida at Large

Elena Jovanov
Print, type or stamp name of notary public

My Commission Expires:

