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Legal Department

NANCY B. WHITE  
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BellSouth Telecommunications, Inc.  
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January 31, 1996

Mrs. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

RE: Docket No. 961346-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Telenet's First Set of Data Requests. Please file these documents in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White (BL)*  
Nancy B. White

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
R. G. Beatty  
W. J. Ellenberg

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CERTIFICATE OF SERVICE  
DOCKET NO. 961346-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 31st day of January, 1997 to the following:

Douglas G. Bonner  
Colin M. Alberts  
SWIDLER & BERLIN, CHARTERED  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007  
Attys. for Telenet

Charles Pellegrini  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Nancy S. White (PL)

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FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Arbitration )	
of Dispute with BellSouth )	
Telecommunications, Inc. )	Docket No. 961346-TP
Regarding Call Forwarding, by )	
Telenet of South Florida, Inc. )	Filed: January 31, 1997
_____ )	

BELLSOUTH TELECOMMUNICATIONS, INC.'S  
OBJECTIONS TO TELENET'S FIRST SET OF DATA REQUESTS

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), hereby files, pursuant to Rule 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, the following Objections to Telenet of South Florida, Inc.'s ("Telenet"), First Set of Data Requests.

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the five-day requirement set forth in the procedural order issued by the Florida Public Service Commission ("Commission") in the above-referenced docket. Should additional grounds for objection be discovered as BellSouth prepares its Answers to the above-referenced set of requests, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on Telenet. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by Telenet, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on Telenet.

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GENERAL OBJECTIONS

BellSouth makes the following General Objections to Telenet's First Set of Data Requests that will be incorporated by reference into BellSouth's specific responses when its Answers are served on Telenet.

1. BellSouth objects to the requests to the extent that such requests seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted Telenet's requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its Answers accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to Telenet's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

4. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

SPECIFIC OBJECTIONS

Subject to, and without waiver of, the foregoing general objections, BellSouth enters the following specific objections with respect to Telenet's requests:

5. With respect to Request Nos. 2 and 3, BellSouth objects to these requests to the extent that they are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action.

Respectfully submitted this 31st day of January, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (Bk)

ROBERT G. BEATTY

J. PHILLIP CARVER

c/o Nancy Sims

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