

NANCY B. WHITE
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404)335-0710

February 27, 1997

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

RE: Docket No. 970172-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to MCI's First Request for Production of Documents. 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.

ACK _____

AFA 2

APP _____

CAF _____

CMB Simmons

CTR _____

EAG _____

LEG 1 Enclosures

LIN 5

OPC _____

RCH _____

SEC 1

WAS _____

OTH _____

Sincerely,

Nancy B. White
Nancy B. White (PW)

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

DOCUMENT NUMBER - DATE

02202 FEB 27 97

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

In re: Petition by MCI Telecommunications)
Corporation for an Order Requiring) Docket No. 970172-TP
BellSouth Telecommunications, Inc. to)
Remove its Deregulated Payphone) Filed: February 27, 1997
Investment and associated expenses from)
Its Intrastate Operations and Reduce the)
Carrier Common Line rate element of its)
Intrastate Switched access charges by)
Approximately \$36.5 million as Required)
by the Federal Telecommunications)
Act of 1996.)

BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS
TO MCI'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

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 MCI Telecommunications Corporation's ("MCI") First Request for Production of Documents.

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

GENERAL OBJECTIONS

BellSouth makes the following General Objections to MCI's First Request for Production of Documents that will be incorporated by reference into BellSouth's specific responses when its Responses are served on MCI.

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 MCI's requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its Responses 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 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 MCI's requests:

4. With respect to Request No. 1, BellSouth objects to this request to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

Respectfully submitted this 27th day of February, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (pm)

ROBERT G. BEATTY

J. PHILLIP CARVER

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305)347-5555

William J. Ellenberg II (pm)

WILLIAM J. ELLENBERG II

NANCY B. WHITE

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404)335-0710

CERTIFICATE OF SERVICE
DOCKET NO. 970172-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
U. S. regular mail this 27th day of February, 1997 to the following:

Martha Carter Brown
Legal Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
(904) 413-6204

Richard D. Melson, Esq.
Hopping Green Sims & Smith
123 South Calhoun Street
Tallahassee, FL 32314
(904) 222-7500

Michael J. Henry
MCI Telecommunications Corporation
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30342
(404)267-6140

Nancy B. White (ps)

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