

NANCY B. WHITE
Assistant General Counsel-Florida

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

July 31, 1997

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: **Docket No. 970804-TP**
311 Direct, Inc.

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to Staff's First Request for Production of Documents, which we ask that you file in the captioned matter.

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 to the parties shown on the attached Certificate of Service.

Sincerely,



Nancy B. White

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU** _____
- CIP _____
- EAC _____
- LEG _____
- LI _____
- _____
- _____
- _____
- _____
- _____
- _____

Enclosures
/mf

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II



17736 JUL 31 1997
DIVISION OF RECORDS AND REPORTING

CERTIFICATE OF SERVICE
DOCKET NO. 970604-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by *Hand-delivery and U.S. Mail this 31st day of July, 1997 to the following:

* William P. Cox
Legal Counsel
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

MUCHNICK, WASSERMAN & DOLIN
Attorneys for 311 DIRECT,
INC., Petitioner
Presidential Circle
4000 Hollywood Boulevard
Suite 710 North
Hollywood, Florida 33021
Tel. No. (954) 989-8100
Tel. No. (305) 624-9100
Fax. No. (954) 989-8700


Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Transfer of N11)
Code by 311 Direct, Inc.)
_____)

Docket No. 970604-TP

Filed July 31, 1997

ORIGINAL
FILE COPY

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE AND OBJECTIONS TO STAFF'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth") files (1) pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Response and Objections to the Florida Public Service Commission Staff's ("Staff") First Request for Production of Documents dated June 26, 1997.

GENERAL RESPONSE AND OBJECTIONS

1. With regard to Staff's definition of "document" or "documents", BellSouth has made a diligent, good faith attempt to locate documents responsive to the scope of Staff's individual requests for documents.
2. BellSouth does not believe it was Staff's intent to require BellSouth to produce again the same documents previously produced in other dockets, but to the extent it does, BellSouth objects on the basis that such a request would be unduly burdensome, oppressive, and unnecessary, and for these reasons, is prohibited.
3. The following Specific Responses are given subject to the above-stated General Responses and Objections.

DATE: 1997 JUL 31

1997 JUL 31

1997 JUL 31

SPECIFIC RESPONSE

4. With respect to Request No. 1, BellSouth has no responsive documents in its possession, custody, or control.
5. With respect to Request No. 2, BellSouth has no responsive documents in its possession, custody, or control.
6. With respect to Request No. 3, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.
7. With respect to Request No. 4, BellSouth refers Staff to the Attachments to BellSouth's response to Interrogatory No. 6(c).
8. With respect to Request No. 5, BellSouth has no responsive documents in its possession, custody, or control.
9. With respect to Request No. 6, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.
10. With respect to Request No. 7, BellSouth refers Staff to the Attachment to BellSouth's response to Interrogatory No. 16.
11. With respect to Request No. 8, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

12 With respect to Request No. 9 BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

13 With respect to Request No. 10 BellSouth refers Staff to BellSouth's responses to Requests 6, 7, and 8

Respectfully submitted this 31st day of July, 1997

BELLSOUTH TELECOMMUNICATIONS, INC

Robert G. Beatty (for)
ROBERT G BEATTY
NANCY B WHITE
150 West Flagler Street
Suite 1910
Miami, Florida 33130
(305) 347-5558

William J. Ellenberg II (for)
WILLIAM J ELLFNBERG II
J PHILLIP CARVER
Suite 4300
675 W Peachtree St NE
Atlanta, GA 30375
(404) 335-0711