

Legal Department

NANCY B. WHITE Assistant General Counsel-Florids

BeilSouth 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.

NANCA B. White (AN)

Nancy B White

AFA ____ APP CAF Enclosures NF C 7 EAC. ____cc: All parties of record A. M. Lombardo LEC. R. G. Beatty LĽ William J. Ellenberg II e. E. 5 tree W/ n

ACK

CERTIFICATE OF SERVICE DOCKET NO. 970604-TP

I HEREBY CERTIFY that a true and correct copy if the foregoing was served by *Hand-delivery and ".S. Mail firs 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

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

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

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

BellSouth's 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 abovestated General Responses and Objections

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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

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)

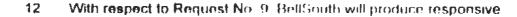
8. With respect to Request No. 5. BellSouth has no responsive documents in its possession, custody, or control

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.

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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

H. Bratty 100) ROBERT G BEATTY

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