

J. PHILLIP CARVER
General Attorney

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

ORIGINAL
FILE COPY

August 18, 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. 960786-TL

Dear Mrs. Bayo:

Enclosed is an original and fifteen copies of BellSouth's
Objections to Sprint's Second Request for Production of Documents. We
ask that this be filed 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 on the parties shown on the attached Certificate of
Service.

Sincerely,

J. Phillip Carver (ke)
J. Phillip Carver

- ACK Enclosures
- AFA cc: All Parties of Record
- APP A. M. Lombardo
- CAF R. G. Beatty
- CMU *Green* W. J. Ellenberg
- CTR
- ENG
- LEG *2*
- LRI *5*
- OPG
- RCH
- SEC *1*
- WAS
- OTH

RECEIVED & FILED
Law
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

08303 AUG 18 97

FPSC-RECORDS/REPORTING

ORIGINAL
FILE COPY

CERTIFICATE OF SERVICE
DOCKET NO. 960786-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 18th day of August, 1997 to the following:

Mr. Brian Sulmonetti
LDDS WorldCom Communications
Suite 400
1515 S. Federal Highway
Boca Raton, FL 33432
(407) 750-2529

Floyd R. Self, Esq.
Norman H. Horton, Esq.
Messer, Caparello, Madsen,
Goldman & Metz, P.A.
215 South Monroe Street
Suite 701
P.O. Box 1876
Tallahassee, FL 32302-1876
Atty. for LDDS WorldCom Comm.
(904) 222-0720

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Atty. for FCCA
(904) 222-2525

Thomas K. Bond
MCI Telecommunications Corp.
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342
(404) 267-6315

Richard D. Melson*
Hopping Green Sams & Smith
123 South Calhoun Street
P.O. Box 6526
Tallahassee, FL 32314
(904) 222-7500

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs,
Odom & Ervin
305 South Gadsden Street
P.O. Drawer 1170
Tallahassee, FL 32302
Atty. for Sprint
(904) 224-9135

Benjamin W. Fincher
3100 Cumberland Circle
Atlanta, Georgia 30339
Atty. for Sprint
(404) 649-5145

Monica Barone
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Patrick K. Wiggins, Esq.
Donna L. Canzano, Esq.
Wiggins & Villacorta, P.A.
501 East Tennessee Street
Suite B
Post Office Drawer 1657
Tallahassee, Florida 32302
Tel. (904) 222-1534
Fax. (904) 222-1689
Attys. for Intermedia

Patricia Kurlin
Intermedia Comm., Inc.
3625 Queen Palm Drive
Tampa, Florida 33619-1309
(813) 829-0011

Peter M. Dunbar, Esq.
Robert S. Cohen, Esq.
Pennington, Culpepper, Moore,
Wilkinson, Dunbar &
Dunlap, P.A.
215 South Monroe Street
2nd Floor
Post Office Box 10095
Tallahassee, FL 32302
(904) 222-3533

Sue E. Weiske, Esq.
Time Warner Communications
160 Inverness Drive West
2nd Floor North
Englewood, Colorado 80112
(303) 799-5513

Tracy Hatch, Esq.
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
(904) 425-6364

Marsha E. Rule, Esq.
c/o Doris M. Franklin
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301

Andrew O. Isar
Director - Industry Relations
Telecomm. Resellers Assoc.
4312 92nd Avenue, N.W.
P.O. Box 2461
Gig Harbor, WA 98335-4461
(206) 265-3910

Richard M. Rindler
Swindler & Berlin, Chartered
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007
Tel. (202) 424-7771
Fax. (202) 424-7645

Kenneth A. Hoffman, Esq.
William B. Willingham, Esq.
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
215 South Monroe Street
Suite 420
Tallahassee, FL 32301-1841
(850) 681-6788

Mr. Paul Kouroupas
TCG-Washington
2 Lafayette Centre
1133 Twenty First Street, N.W.
Suite 400
Washington, D.C. 20036
(202) 739-0030

Laura L. Wilson
Vice President
Regulatory Affairs
Florida Cable Telecomm. Assoc.
310 North Monroe Street
Tallahassee, FL 32301
Tel. (904) 681-1990
Fax. (904) 681-9676

J. Phillip Carver (ke)
J. Phillip Carver

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of)	
BellSouth Telecommunications,)	Docket No. 960786-TL
Inc.'s entry into interLATA)	
services pursuant to Section 271)	Filed: August 18, 1997
of the Federal Telecommunications)	
Act of 1996)	
_____)	

BELLSOUTH'S OBJECTIONS TO SPRINT'S SECOND
REQUEST FOR PRODUCTION OF DOCUMENTS

BellSouth Telecommunications, Inc. ("BellSouth") hereby files its
Objections to Sprint Communications Company Limited Partnership's Second
Request for Production of Documents by BellSouth Telecommunications, Inc.
(Number 3) and states the following:

1. On August 13, 1997, Sprint Communications Company Limited
Partnership ("Sprint") propounded upon BellSouth a request to produce all
documents that BellSouth produces in response to AT&T's First Request for
Production of Documents, dated August 11, 1997. BellSouth hereby adopts by
reference each and every objection that it has filed on this date to the above
referenced production request by AT&T. BellSouth also adopts by reference the
additional objections that it will file on August 22, 1997, as set forth in its
response to AT&T's production request.

2. Moreover, BellSouth additionally objects to Sprint's production
request because it was not made within the timeframe set for discovery by this

DOCUMENT NUMBER-DATE

08303 AUG 18 97

FPSC-RECORDS/REPORTING

Commission. Specifically, the Second Order Establishing Procedure, dated June 12, 1997 (Order No. PSC-97-0703-PCO-TL) stated specifically that "all discovery shall be completed by August 22, 1997" (Paragraph 4). The Order further provides that discovery responses shall be filed within ten days. Since Sprint's request was served on August 13, 1997, a response is due on August 23, 1997, i.e., after the date by which discovery is to be concluded. BellSouth objects to the production request of Sprint for this additional reason.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (KR)

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy H. Sims

Suite 400

150 South Monroe Street

Tallahassee, FL 32301

(305) 347-5558

William J. Ellenberg II (KR)

WILLIAM J. ELLENBERG II

J. PHILLIP CARVER

675 West Peachtree Street, Room 4300

Atlanta, Georgia 30375

(404) 335-0710