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Legal Department

NANCY B. WHITE  
Assistant General Counsel-Florida

98 SEP 25 PM 4:43

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

RECORDS AND  
REPORTING

September 25, 1998

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. 980946-TL**  
**Temp. Waiver Daytona Beach/Port Orange Central Office**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunication's Inc.'s Response 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*

Nancy B. White

RECEIVED & FILED  
*[Signature]*  
FPSC BUREAU OF RECORDS

Enclosures

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

- ACK
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DOCUMENT NUMBER-DATE

10652 SEP 25 98

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 980946-TL**

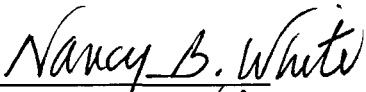
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

\*Hand-Delivery and U.S. Mail this 25th day of September, 1998 to the following:

Beth Keating, Esq. \*  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Amanda Grant  
BellSouth Telecommunications, Inc.  
Regulatory & External Affairs  
675 West Peachtree Street, N.E.  
Room 38L64  
Atlanta, Georgia 30375

Donna L. Canzano  
Patrick Knight Wiggins  
Wiggins & Villacorta, P.A.  
2145 Delta Boulevard  
Suite 200  
P.O. Drawer 1657  
Tallahassee, FL 32302  
Tel. No. (850) 385-6007  
Fax. No. (850) 385-6008

  
\_\_\_\_\_  
Nancy B. White (BW)

Steve Brown  
Intermedia Communications, Inc.  
3625 Queen Palm Drive  
Tampa, FL 33619-1309  
Tel. No. (813) 829-0011

Suzanne Fannon Summerlin, Esq.  
Supra Telecommunications and  
Information Systems, Inc.  
1311-B Paul Russell Rd., #201  
Tallahassee, Florida 32301  
Tel. No. (850) 656-2288  
Fax. No. (850) 656-5589

DOCUMENT NUMBER-DATE

10652 SEP 25 98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications, ) Docket No.: 980946-TL  
Inc. 's Petition for Temporary Waiver )  
for Daytona Beach Port Orange )  
Central Office )  
\_\_\_\_\_ ) Filed: September 25, 1998

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

BellSouth Telecommunications, Inc. ("BellSouth") files pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Response to the Florida Public Service Commission Staff's ("Staff") First Request for Production of Documents, dated August 21, 1998.

**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'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 above-stated General Responses and Objections.

**SPECIFIC RESPONSE**

4. With respect to Request No. 1, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 25th day of September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

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

*William J. Ellenberg II*  
\_\_\_\_\_  
WILLIAM J. ELLENBERG II (BW)  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0711

NANCY B. WHITE  
Assistant General Counsel-Florida

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

September 25, 1998

**Via Hand Delivery**

Ms. Beth Keating  
Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 980946-TL**  
**Temp. Waiver Daytona Beach/Port Orange Central Office**

Dear Ms. Keating:

Enclosed is BellSouth Telecommunication's Inc.'s Response to Staff's First Set of Interrogatories and First Request for Production of Documents.

Sincerely,

*Nancy B. White*  
(BN)

Nancy B. White

Enclosures

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