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RECORDS AND
REPORTING

April 12, 1999

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. 980948-TL

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Intermedia Communications, Inc.'s First Request for Production of Documents and Motion for Protective Order. Please file this document 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.

Sincerely,

J. Phillip Carver

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- ACK _____
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- APP _____
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- RCH _____
- SEC _____
- WAS _____
- OTH _____

Enclosures

cc: All parties of record
M. M. Criser, III
N. B. White
William J. Ellenberg II (w/o enclosures)

DOCUMENT NUMBER-DATE

04661 APR 12 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for waiver of physical)	
Collocation requirements set forth)	
In the Telecommunications Act of 1996)	Docket No. 980948-TL
And the FCC's First Report and)	
Order, for the Miami Palmetto Central)	
Office, by BellSouth)	Filed: April 12, 1999
Telecommunications, Inc.)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
 RESPONSE TO INTERMEDIA COMMUNICATIONS INC.'S
 FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND
MOTION FOR PROTECTIVE ORDER**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Responses, Objections and Motion for Protective Order to Intermedia Communications Inc.'s ("Intermedia") First Request for Production of Documents.

GENERAL RESPONSES

BellSouth makes the following General Objections to Intermedia's First Request for Production of Documents:

1. BellSouth has interpreted Intermedia'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.

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2. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

3. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been provided in response to these discovery requests. Rather, these responses provide all of the information obtained by BellSouth after a reasonable and diligent search conducted in connection with this discovery request. BellSouth conducted a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

MOTION FOR PROTECTIVE ORDER

4. BellSouth objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that Intermedia requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to be reviewed by counsel for Intermedia at a mutually agreeable time and place, pursuant to an

appropriate Protective Agreement and subject to any other general or specific objections contained herein.

SPECIFIC RESPONSES

5. In response to Intermedia's Request to Produce No. 1, BellSouth agrees to produce the requested information. This information, however, is proprietary and is, therefore, being produced only upon execution of a protective agreement as set forth above.

Respectfully submitted this 12th day of April, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
Docket Nos. 980946-TL, 980947-TL, 980948-TL, 981011-TL,
981012-TI and 981250-TL

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

U.S. Mail this 12th day of April, 1999 to the following:

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