

NANCY B. WHITE  
General Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Suite 400  
Tallahassee, Florida 32301  
(404) 529-5387

ORIGINAL  
OCT 10 1995

October 9, 1995

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

RE: Docket No. [REDACTED]

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to MCI Metro's First Request for Production of Documents and Motion for Protective Order. Please file this document in the captioned docket.

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.

ACK  
APA  
APP 1  
CSC  
CSC Saylor  
CSC

Sincerely,

*Nancy B. White*  
Nancy B. White (P)

Enclosures

cc: 1 All Parties of Record  
5 A. M. Lombardo  
R. G. Beatty  
R. D. Lackey

1  
[Handwritten initials]

DOCUMENT NUMBER-DATE

09949 OCT-95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Investigation into Temporary Local )  
Telephone Number Portability )  
Solution to Implement Competition )  
in Local Exchange Telephone Markets)  

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Docket No.: 950737-TP  
Filed: October 9, 1995

FILED  
OCT 11 1995

BELLSOUTH'S RESPONSE AND OBJECTIONS TO  
MCI METRO'S FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS AND MOTION FOR PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and files, (1) pursuant to Rule 25-22.034, Florida Administrative Code, and Rules 1.280(c) and 1.350 of the Florida Rules of Civil Procedure, its Responses and Objections to MCI Metro Access Transmission Services, Inc.'s ("MCImetro") First Request for Production of Documents dated September 19, 1995, and (2) Motion for Protective Order.

GENERAL RESPONSE AND OBJECTIONS

1. BellSouth objects to MCImetro definition of "document" or "documents". MCImetro's definition of these terms is overly broad and is objectionable pursuant to standards adopted in Caribbean Security Systems v. Security Control Systems, Inc., 486 So.2d 654 (Fla. App. 3rd District 1986).

2. BellSouth objects to MCImetro's instruction relating to the details of privileged documents. To the extent production is objected to due to the privileged nature of documents, the information suggested by MCImetro would similarly be privileged and is therefore prohibited.

3. BellSouth objects to producing some of the documents requested by MCImetro on the basis that the documents sought contain proprietary and confidential business information

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regarding, among other things, negotiated contracts and competitive strategies. Consequently, BellSouth moves the Prehearing Officer to issue a Protective Order directing that discovery not be had with respect to the proprietary and confidential business documents referenced more specifically herein, or that discovery only be had under certain conditions. BellSouth would be willing to entertain negotiations regarding producing certain of these documents to the attorneys representing MCImetro upon the execution of an appropriate protective agreement.

#### SPECIFIC RESPONSES

4. With respect to Request No. 1, BellSouth objects to producing the documents requested on the basis that the documents responsive to this request contain proprietary and confidential business information. Consequently, BellSouth moves for a Protective Order as set forth herein. In the alternative, the production of such documents should occur only after the execution of an acceptable protective agreement.

5. With respect to Request No. 2, BellSouth objects to producing the documents requested on the basis that the documents responsive to this request contain proprietary and confidential business information. Consequently, BellSouth moves for a Protective Order as set forth herein. In the alternative, the production of such documents should occur only after the execution of an acceptable protective agreement.

Respectfully submitted this 9th day of October, 1995.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty  
ROBERT G. BEATTY (es)  
PHILLIP J. CARVER  
c/o Nancy Sims  
Suite 400  
150 South Monroe Street  
Tallahassee, Florida 32301  
(305) 530-5555

R. Douglas Lackey  
R. DOUGLAS LACKEY (es)  
NANCY B. WHITE  
4300 Southern Bell Center  
675 West Peachtree St., N.E.  
Atlanta, Georgia 30375  
(404) 529-3862  
(404) 529-5387

**CERTIFICATE OF SERVICE**  
**Docket No. 950737-TP**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by Federal Express this 9th day of October, 1995 to:

C. EVERETT BOYD  
ERVIN, VARN, JACOBS  
ODOM & ERVIN  
305 S. GADSDEN STREET  
TALLAHASSEE, FL 32302  
904-224-9135  
904-222-9164

F. BEN POAG  
SPRINT/UNITED TELEPHONE OF  
FLORIDA  
315 S. CALHOUN STREET  
SUITE 740  
TALLAHASSEE, FL 32316  
904-681-3100

KIMBERLY CASWELL, ESQ.  
GTE FLORIDA, INCORPORATED  
201 N. FRANKLIN STREET  
TAMPA, FL 33602  
813-224-4001

LAURA L. WILSON, ESQ.  
CHARLES F. DUDLEY, ESQ.  
FLORIDA CABLE  
TELECOMMUNICATIONS  
ASSOCIATION, INC.  
310 N. MONROE STREET  
TALLAHASSEE, FL 32301  
904-681-1990

MS. JILL BUTLER  
FLORIDA REGULATORY DIRECTOR  
TIME WARNER COMMUNICATIONS  
2773 RED MAPLE RIDGE  
TALLAHASSEE, FL 32301  
904-942-1181

DAVID B. ERWIN  
YOUNG, VAN ASSENDERP,  
VARNADOE & BENTON, P.A.  
225 S. ADAMS STREET  
SUITE 200  
TALLAHASSEE, FL 32301  
904-222-7206

CHARLES BECK  
OFFICE OF PUBLIC COUNSEL  
HOUSE OF REPRESENTATIVES  
THE CAPITOL  
TALLAHASSEE, FL 32301  
904-488-9330

LEE L. WILLIS  
J. JEFFERY WAHLEN  
AUSLEY, MCMULLEN, MCGEHEE,  
CAROTHERS & PROCTOR  
227 S. CALHOUN STREET  
TALLAHASSEE, FL 32301  
904-224-9115

PETER M. DUNBAR, ESQ.  
CHARLES W. MURPHY, ESQ.  
PENNINGTON & HABEN, P.A.  
215 S. MONROE STREET  
SECOND FLOOR  
TALLAHASSEE, FL 32301  
904-222-3533

FLOYD R. SELF, ESQ.  
MESSER, VICKERS, CAPARELLO,  
MADSEN, GOLDMAN & METZ, P.A.  
215 S. MONROE STREET  
SUITE 701  
TALLAHASSEE, FL 32301  
904-222-0720

WILLIAM H. HIGGINS, ESQ.  
CELLULAR ONE  
SUITE 900  
250 S. AUSTRALIAN AVENUE  
WEST PALM BEACH, FL 33401  
407-655-7447

ALAN N. BERG  
UNITED TELEPHONE COMPANY  
CENTRAL TELEPHONE COMPANY  
555 LAKE BORDER DRIVE  
APOPKA, FL 32703  
407-889-6000

TONY H. KEY  
SPRINT  
3100 CUMBERLAND CIRCLE  
ATLANTA, GA 30339  
404-859-5145

TIMOTHY DEVINE  
MFS COMMUNICATIONS COMPANY,  
INC.  
6 CENTURY DRIVE  
SUITE 300  
PARSIPPANY, NJ 07054  
201-938-7300

RICHARD M. RINDLER  
JAMES C. FALVEY  
SWIDLER & BERLIN, CHARTERED  
3000 K STREET, NW  
SUITE 300  
WASHINGTON, DC 20007  
202-424-7500

MICHAEL J. HENRY  
MCI TELECOMMUNICATIONS CORP.  
780 JOHNSON FERRY ROAD  
SUITE 700  
ATLANTA, GA 30342  
404-

RICHARD D. MELSON  
HOPPING GREEN SAMS & SMITH  
123 S. CALHOUN STREET  
TALLHASSEE, FL 32301  
904-222-7500

HARRIET EUDY  
ALLTEL FLORIDA, INC.  
206 WHITE AVENUE  
LIVE OAK, FL 32060

DEWAYNE LANIER  
GULF TELEPHONE  
115 WEST DREW STREET  
PERRY, FL 32347  
904-584-2211

DANIEL V. GREGORY  
QUINCY TELEPHONE COMPANY  
107 W. FRANKLIN STREET  
QUINCY, FL 32351  
904-875-5000

JOHN MCGLEW  
NORTHEAST FLORIDA TELEPHONE  
CO.  
130 N. 4TH STREET  
MACCLENNY, FL 32063  
904-259-2261

FERRIN SEAY  
FLORALA TELECOMMUNICATIONS CO.  
522 N. 5TH STREET  
FLORALA, AL 36442  
334-858-3211

CHARLES L. DENNIS  
INDIANTOWN TELECOMMUNICATIONS  
SYSTEMS, INC.  
15925 S.W. WARFIELD BOULEVARD  
INDIANTOWN, FL 34956  
407-597-2111

JAMES W. TYLER  
VISTA-UNITED  
TELECOMMUNICATIONS  
3100 BONNET CREEK ROAD  
LAKE BUENA VISTA, FL 32830  
407-827-2000

JOHN VAUGHAN  
ST. JOSEPH TELEPHONE  
AND TELEGRAPH CO.  
502 5TH STREET  
PORT ST. JOE, FL 32456  
904-229-7231

MICHAEL W. TYE  
AT&T  
106 E. COLLEGE AVENUE  
SUITE 1410  
TALLHASSEE, FL 32301  
904-425-6360

J. P. GILLAN  
J. P. GILLAN & ASSOCIATES  
121 N.W. IVANHOE BOULEVARD  
ORLANDO, FL 32804  
407-649-9161

ROBIN D. DUNSON  
1200 PEACHTREE STREET  
PROMENADE I, ROOM 4038  
ATLANTA, GA 30309

MONICA M. BARONE  
FLORIDA PUBLIC SERVICE  
COMMISSION  
2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FL 32399  
904-413-6199

Nancy B. White  
(07)