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ORIGINAL
FILE COPY

October 10, 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. 950737-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response And Objections to Staff's First Request for Production of Documents and Notice of Intent to Request Confidential Classification. Please file these documents 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.

Sincerely,

Nancy B. White (NW)
Nancy B. White

Enclosures

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

This Notice of Intent was filed with Confidential Document No. 09982-95. The document has been placed in the confidential files pending receipt of a request for confidential treatment.

Mrs

DOCUMENT NUMBER-DATE

09981 OCT 10 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)
_____)

Docket No.: 950737-TP

Filed: October 10, 1995

BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE AND OBJECTIONS TO STAFF'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
AND NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and (1) files pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Responses and Objections to the Florida Public Service Commission Staff's ("Staff") First Request for Production of Documents dated September 21, 1995 and 2) pursuant to Rule 25-22.006, Florida Administrative Code, its Notice of Intent to Request Confidential Classification.

NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

Some of the documents that will be produced for the Staff in response to its First Request for Production of Documents contain information which is exempted from public disclosure pursuant to §§ 119.07 and 364.183, Florida Statutes. Specifically, some of the documents contain, among other things, competitively-sensitive information. This information is included as proprietary confidential business information under § 364.183, Florida Statutes and Rule 25-22.006, Florida Administrative Code. Because these documents contain exempt information, BellSouth is filing this Notice of Intent to Request Confidential Classification, pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Staff access to these

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

documents without delay. The original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on the division requesting the information.

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 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 Response and Objectives.

SPECIFIC RESPONSES

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 subject to the Notice of Intent to Request Confidential Classification set forth above.

Respectfully submitted this 10th day of October, 1995.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
Docket No. 950737-TP

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by Federal Express this 10th day of October, 1995 to:

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