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ORIGINAL
FILE COPY

October 11, 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 McCaw Communications of Florida, Inc.'s First Request for Production of Documents and Motion for Protective Order. 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
Nancy B. White (P2)

ACK ✓

ADA Enclosures

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

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[Signature]
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LRD 1
LW 5
GDD
GDB
GDP 1
WAG

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 11, 1995

BELLSOUTH'S RESPONSE AND OBJECTIONS TO
MCCAW COMMUNICATIONS OF FLORIDA, INC.'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 McCaw Communications of Florida, Inc.'s ("McCaw") First Request for Production of Documents dated September 28, 1995, and (2) Motion for Protective Order.

GENERAL RESPONSE AND OBJECTIONS

1. BellSouth objects to McCaw's definition of "document" or "documents". McCaw'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 McCaw'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 McCaw would similarly be privileged and is therefore prohibited.

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

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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 McCaw 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.

Respectfully submitted this 11th 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
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