

NANCY B. WHITE  
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BellSouth Telecommunications, Inc.  
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(404) 529-5387

October 16, 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. 950985-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*  
Nancy B. White (2)

Enclosures

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

x-ref DN 10396-95

This Notice of Intent was filed with Confidential Document No. 10207-95. The document has been placed in the confidential files pending receipt of a request for confidential treatment.

CONFIDENTIAL

*DS*

DOCUMENT NUMBER-DATE  
10206 OCT 16 1995  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s) )  
to establish nondiscriminatory ) Docket No. 950985-TP  
rates, terms, and conditions for )  
interconnection involving local )  
exchange companies and alternative ) Filed: October 16, 1995  
local exchange companies pursuant )  
to Section 364.162, Florida )  
Statutes )  
\_\_\_\_\_ )

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 27, 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, cost 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

DOCUMENT NUMBER-DATE

10206 OCT 16 1995

FPSC-RECORDS/REPORTING

25-22.006(3)(a), Florida Administrative Code, in order to allow the Staff access to these 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 has no Florida specific documents responsive to this request in its possession, custody, or control.

5. With respect to Request No. 2, BellSouth has no documents responsive to this request in its possession, custody, or control.

6. With respect to Request No. 3, BellSouth has no documents responsive to this request in its possession, custody, or control.

7. With respect to Request No. 4, BellSouth has no documents responsive to this request in its possession, custody, or control.

8. With respect to Request No. 5, 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 16th day of October, 1995.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Robert G. Beatty*  
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J. PHILLIP CARVER  
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*R. Douglas Lackey*  
R. DOUGLAS LACKEY  
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(404) 529-5387

**CERTIFICATE OF SERVICE**  
**Docket No. 950985-TP**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Federal Express this 16th day of October, 1995 to:

RICHARD H. BRASHEAR  
ALLTELL FLORIDA, INC.  
206 WHITE STREET  
LIVE OAK, FL 32060  
904-364-2517

DANIEL V. GREGORY  
QUINCY TELEPHONE COMPANY  
107 W. FRANKLIN STREET  
QUINCY, GL 32351  
904-875-5214

F. B. POAG  
CENTRAL TELEPHONE COMPANY  
OF FLORIDA  
555 LAKE BORDER DRIVE  
APOPKA, FL 32703  
407-889-6405

JOHN H. VAUGHAN  
ST. JOSEPH TELEPHONE AND  
TELEGRAPH COMPANY  
502 5TH STREET  
PORT ST. JOE, FL 32456  
904-229-7221

LAURIE A. MAFFETT  
FRONTIER COMMUNICATIONS OF  
THE SOUTH, INC.  
180 SOUTH CLINTON AVENUE  
ROCHESTER, NY 14646  
716-777-5125

FERRIN SEAY  
FLORALA TELEPHONE  
COMPANY, INC.  
522 N. 5TH STREET  
FLORALA, AL 36442  
334-858-3211

BEVERLY Y. MENARD  
GTE FLORIDA, INC.  
106 EAST COLLEGE AVENUE  
SUITE 1440  
TALLAHASSEE, FL 32301  
813-224-4825

LYNN B. HALL  
VISTA-UNITED  
TELECOMMUNICATIONS  
P.O. BOX 10180  
LAKE BUENA VISTA, FL 32830  
407-827-2210

A. D. LANIER  
GULF TELEPHONE COMPANY  
115 W. DREW STREET  
PERRY, FL 32347  
904-584-0900

JODIE DONOVAN  
TCG SOUTH FLORIDA  
1133 21ST STREET, NW  
SUITE 400  
WASHINGTON, DC 20036

ROBERT M. POST, JR.  
INDIANTOWN TELEPHONE  
SYSTEM, INC.  
16001 S.W. MARKET STREET  
INDIANTOWN, FL 34956  
407-597-3113

MICHAEL W. TYE  
AT&T  
106 EAST COLLEGE AVENUE  
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TALLAHASSEE, FL 32301  
904-425-6360

JOHN T. MCGLEW  
N.E. FLORIDA TELEPHONE  
COMPANY, INC.  
130 N. 4TH STREET  
MACCLENNY, FL 32063  
904-259-2261

ROBIN D. DUNSON, ESQ.  
1200 PEACHTREE STREET, NE  
PROMENADE I, ROOM 4038  
ATLANTA, GEORGIA 30309

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

PATRICK K. WIGGINS  
INTERMEDIA COMMUNICATIONS OF  
FLORIDA, INC.  
WIGGINS & VILLACORTA  
501 EAST TENNESSEE STREET, #B  
TALLAHASSEE, FL 32308  
904-222-1534

FLOYD SELF  
MCCAW COMMUNICATIONS  
MESSER, VICKERS, CAPARELLO,  
MADSEN, LEWIS, GOLDMAN & METZ  
215 S. CALHOUN STREET, #701  
TALLAHASSEE, FL 32301  
904-222-0720

BOB ELIAS  
FLORIDA PUBLIC SERVICE  
COMMISSION  
2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FL 32399  
904-613-6189

Nancy B. White  
(P2)