

MARY JO PEED  
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BellSouth Telecommunications, Inc.  
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(404) 335-0705

ORIGINAL  
FILE COPY

October 31, 1995

Mrs. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 921074-TP

Dear Mrs. Bayo:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to IAC's Fifth Request for Production of Documents to be filed in the above mentioned docket.

A copy of this letter is enclosed. Please indicate on the copy that the original was filed and return the copy to me. Copies of BellSouth's Responses and Objections have been served on the parties shown on the attached Certificate of Service.

Sincerely,  
*Mary Jo Peed*  
Mary Jo Peed

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CTR \_\_\_\_\_
- CTR Enclosures
- EAG \_\_\_\_\_
- LEG 1 \_\_\_\_\_
- LIT 5 \_\_\_\_\_
- OPC \_\_\_\_\_
- ATH \_\_\_\_\_
- SIS 1 \_\_\_\_\_
- WFB \_\_\_\_\_
- OTH \_\_\_\_\_

cc: Robert G. Beatty  
A. M. Lombardo  
R. Douglas Lackey  
All Parties noted on Certificate of Service

RECEIVED & FILED

98  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
10698 OCT 31 95  
FPSC-RECORDS/REPORTING

BEFORE  
THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
FILE COPY

In re: Expanded Interconnection ) DOCKET NO. 921074-TP  
Phase II and Local Transport )  
Restructure )  
\_\_\_\_\_ ) October 31, 1995

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
RESPONSES AND OBJECTIONS TO IAC'S FIFTH  
REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, BellSouth Telecommunications, Inc., ("BellSouth" or "Company") and files pursuant to Rules 25-22.04, Florida Administrative Code and Rule 1.350, Florida Rules of Civil Procedure, its Objections and Responses to Interexchange Access Coalition's ("IAC") Fifth Request for Production of Documents.

**GENERAL RESPONSE AND OBJECTIONS**

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

2. BellSouth does not believe it was IAC's intent to require BellSouth to produce again the same documents previously produced in other requests, 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.

DOCUMENT NUMBER-DATE

10698 OCT 31 1995

FPSC-RECORDS/REPORTING

SPECIFIC RESPONSES

3. Subject to the general objections, which are incorporated by reference into the specific response made herein, BellSouth responds to the individual numbered request contained in IAC's Fifth Request for Production of Documents as follows:

A. In response to Request No. 1, BellSouth objects to this request on the grounds that some of the documents responsive to this request contain proprietary confidential business information. BellSouth will produce the documents pursuant to the protective agreement which has been executed between the parties at a mutually agreeable time and location.

Respectfully submitted this 21<sup>st</sup> day of October, 1995.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (pm)

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**CERTIFICATE OF SERVICE**  
**Dockets No. 921074-TL, 930955-TL,**  
**940014-TL, 940020-TL, 931196-TL, 940190-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 31<sup>st</sup> day of October 1995, to:

Tracy Hatch  
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Fla. Public Service Commission  
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*Mary Jo Peed*  
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