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Legal Department

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**ORIGINAL
FILE COPY**

December 7, 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 Sixth 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 (ea)

ACK
AFA _____
APP _____

CAE Enclosures

CC: *Peith*
Robert G. Beatty

CTR A. M. Lombardo

EAG R. Douglas Lackey
All Parties noted on Certificate of Service

LEG 1

LIN 3

OPC _____

RCH _____

SEC 1

WAS _____

OTH _____

RECEIVED & FILED
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
12297 DEC-7 95
FPSC-RECORDS/REPORTING

BEFORE
THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection
Phase II and Local Transport
Restructure

) DOCKET NO. 921074-TP

) December 7, 1995

BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSES AND OBJECTIONS TO IAC'S SIXTH
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") Sixth 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

12297 DEC-7 88

FPSC-RECORDS/REPORTING

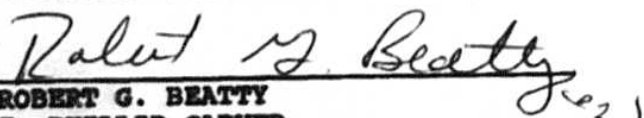
SPECIFIC RESPONSES

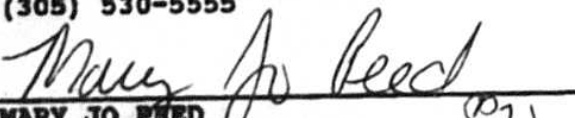
3. Subject to the general objections, which are incorporated by reference into the specific response made herein, BellSouth responds to the individual numbered request contained in IAC's Sixth Request for Production of Documents as follows:

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 7th day of December, 1995.

BELLSOUTH TELECOMMUNICATIONS, INC.


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CERTIFICATE OF SERVICE
Dockets No. 921074-TL, 930955-TL,
940016-TL, 940020-TL, 931196-TL, 940190-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 7th day of December 1995, to:

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