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December 11, 1995

ORIGINAL
FILE COPY

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

RE: Docket No. 950985A-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response And Objections to Florida Cable Telecommunications Association 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 (AS)
Nancy B. White

- ACK
- AFA _____
- APP _____
- CAF _____
- CM Chase
- CTR _____
- EAG _____
- LEG 1
- LIN 5
- OFC _____
- RCH _____
- SEC 1
- WAS _____
- JTH _____

Enclosures

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

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JS
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
12458 DEC 11 95
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

FILE COPY

In re: Resolution of petition(s))
to establish nondiscriminatory)
rates, terms, and conditions for)
interconnection involving local)
exchange companies and alternative)
local exchange companies pursuant)
to Section 364.162, Florida)
Statutes)
_____)

Docket No. 950985-TP

Filed: December 11, 1995

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE AND OBJECTIONS TO
FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION'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 the
Florida Cable Telecommunications Association's ("FCTA") First
Request for Production of Documents dated November 20, 1995, and
(2) Motion for Protective Order.

GENERAL RESPONSE AND OBJECTIONS

1. BellSouth objects to FCTA's definition of "document" or
"documents". FCTA'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 FCTA's instruction relating to the
details of privileged documents. To the extent production is
objected due to the privileged nature of the documents, the
information suggested by FCTA would similarly be privileged and
is therefore prohibited.

3. BellSouth objects to producing some of the documents

DOCUMENT NUMBER-DATE

12458 DEC 11 85

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FPSC-RECORDS/REPORTING

requested by FCTA on the basis that the documents sought contain proprietary and confidential business information regarding, among other things, BellSouth's unit cost information for switched access service rate elements. 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 FCTA 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 regarding BellSouth's unit cost 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.

5. With respect to Request No. 2, BellSouth objects to producing the documents requested on the basis that the documents responsive to this request contain proprietary and confidential business information regarding BellSouth's unit cost 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 December, 1995.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE

Docket No. 950985A-TP

Docket No. 950985B-TP

Docket No. 950985C-TP

Docket No. 950985D-TP

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Federal Express this 11th day of December, 1995 to:

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