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ORIGINAL
FILE COPY

December 22, 1995

Ms. Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
Room 110, Easley Building
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

BY HAND DELIVERY

Re: Docket No. 950985-TP

Dear Ms. Bayo:

Enclosed for filing are an original and 15 copies of McCaw Communications of Florida, Inc.'s Objections to BellSouth Telecommunications, Inc.'s First Request for Production of Documents in the above-referenced docket.

Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

Your attention to this filing is appreciated.

Sincerely,

Norman H. Horton, Jr.
Norman H. Horton, Jr.

- ACK
- AFA _____
- APP _____
- CAP _____
- CM *Chase*
- CTR _____
- EAC _____
- LEG Enclosures
- LN cc: William H. Higgins, Esq.
Parties of Record
- OTC _____
- ROW _____
- SP
- WAS _____
- OTH _____

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DEC 22 1995

DOCUMENT NUMBER-DATE
12971 DEC 22 95
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish nondiscriminatory)
rates, terms, and conditions for)
interconnection involving local) Docket No. 950985-TP
exchange companies and alternative) Filed: December 22, 1995
local exchange companies pursuant)
to Section 364.162, Florida)
Statutes)
_____)

MCCAW COMMUNICATIONS OF FLORIDA, INC.'S
OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

McCaw Communications of Florida, Inc. on behalf of itself and its Florida regional affiliates ("McCaw"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.280 and 1.350, Florida Rules of Civil Procedure, hereby submits the following Objections to the First Request for Production of Documents from BellSouth Telecommunications, Inc. ("BellSouth").

The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the requirement set forth in Order No. PSC-95-1421-PCO-TP issued by the Florida Public Service Commission ("FPSC") in the above-referenced docket on November 22, 1995.

SPECIFIC OBJECTIONS

1. McCaw objects to the production request for the reasons set forth in its Objections to Interrogatory Nos. 1 through 9 and incorporated those objections herein.

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12971 DEC 22 1995
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2. McCaw objects to the production request on the basis that the request is burdensome, overly broad and not reasonably calculated to produce admissible evidence.

3. McCaw objects to the production request on the basis that it is overly broad, vague, unduly expensive and burdensome as framed, the request would be impossible to fully satisfy.

Respectfully submitted this 22nd day of December, 1995.

Respectfully submitted,

MESSER, CAPARELLO, MADSEN,
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FLOYD R. SELF, ESQ.
NORMAN H. HORTON, JR., ESQ.

Attorneys for McCaw Communications
of Florida, Inc. and its Florida
regional affiliates

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of McCaw Communications of Florida, Inc.'s Objections to BellSouth Telecommunications, Inc.'s First Request for Production of Documents in Docket No. 950985-TP has been furnished by Hand Delivery (*) and/or U. S. Mail on this 22nd day of December, 1995 to the following parties of record:

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