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ORIGINAL
FILE COPY

January 2, 1996

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

RE: Docket No. 950984-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Specified 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 (BN)

Enclosures

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

This Notice of Intent was filed with Confidential Document No. 00027-96. The document has been placed in the confidential files pending receipt of a request for confidential treatment.

RECEIVED & FILED

Max
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00026 JAN-28

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish nondiscriminatory)
rates, terms, and conditions for)
resale involving local exchange)
companies and alternative local)
exchange companies pursuant to)
Section 364.161, Florida Statutes)

Docket No. 950984-TP

Filed: January 2, 1996

**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 December 12, 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 and vendor specific 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

DOCUMENT NUMBER-DATE

00026 JAN-2 96

FPSC-RECORDS/REPORTING 330

Classification, pursuant to Rule 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 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 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.

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 2nd day of January, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
Docket No. 950984-TP

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Federal Express this 2nd day of January, 1996 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
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ROCHESTER, NY 14646
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