

FILE COPY

NANCY B. WHITE
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BellSouth Telecommunications, Inc.
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(404) 335-0710

September 10, 1996

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

RE: Docket No. 960833-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to Staff's First Request for Production of Documents, Item Nos. 1-5. Please file these documents in the above-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 to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White (BL)
Nancy B. White

- ADP
- AFD _____
- APP _____ Enclosures
- CAF _____
- CPD
- CTD _____
- EDD _____
- LEI 1 _____
- LDI 5 _____
- OTD _____
- SEC 1 _____
- WAJ _____
- OTH _____

cc: All Parties of Record
R. G. Beatty
A. M. Lombardo
W. J. Ellenberg

RECEIVED & FILED
[Signature]

DOCUMENT NUMBER-DATE

~~09623~~ SEP 10 96

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
DOCKET NO. 960833-TP
DOCKET NO. 960846-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 10th day of September, 1996 to the following:

Tracy Hatch
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
(904)425-6364
(904)425-6343 (fax)

Donna Canzano
Florida Public Service
Commission
2540 Shumard Oak Boulevard
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Nancy B. White (BL)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Matter of the Interconnection)
Agreement Negotiations Between AT&T)
Communications of the Southern States,) Docket No. 960833-TP
and BellSouth Telecommunications, Inc.)
Pursuant to 47 U.S.C. § 252) Filed: September 10, 1996
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE
AND OBJECTIONS TO STAFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS

COMES NOW BellSouth Telecommunications, ("BellSouth") and files pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350 of the Florida Rules of Civil Procedure, its Responses and Objections to Staff's First Request for Production of Documents dated August 21, 1996.

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 Responses and Objections.

DOCUMENT NUMBER-DATE

09623 SEP 10 96

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SPECIFIC RESPONSES

4. With respect to Request No. 1, BellSouth has no responsive documents in its possession, custody, or control.

5. With respect to Request No. 2, BellSouth has no responsive documents in its possession, custody, or control.

6. With respect to Request No. 3, BellSouth has no responsive documents in its possession, custody, or control.

7. With respect to Request No. 4, BellSouth has no responsive documents in its possession, custody, or control.

8. With respect to Request No. 5, BellSouth has no responsive documents in its possession, custody, or control.

Respectfully submitted this 10th day of September, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (BL)

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c/o Nancy Sims
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R. Douglas Lackey (BL)

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