

ORIGINAL
FILE COPY

Legal Department

NANCY B. WHITE
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404)335-0710

September 19, 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. 920260-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to FCTA's 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.

- ACK
- AFA 1
- APP _____
- CAF _____
- CMU Norton
- CTR _____
- EAG _____
- LEG 1
- LIN 5
- OPC _____
- RCH _____
- SEC 1
- WAS _____

Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White

Enclosures

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

OTH
RECEIVED & FILED
BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
10016 SEP 19 96
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph) Filed: September 19, 1996
Company)
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE
AND OBJECTION TO FCTA'S FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS AND MOTION FOR PROTECTIVE ORDER

BellSouth Telecommunications, Inc. ("BellSouth" or
"Company"), hereby files, pursuant to Rule 25-22.034 and 25-
22.035, Florida Administrative Code, and Rules 1.340 and
1.280(b), Florida Rules of Civil Procedure, hereby submits the
following Response and Objections to Florida Cable
Telecommunications Association, Inc.'s ("FCTA") First Request for
Production of Documents to BellSouth.

GENERAL RESPONSES

BellSouth makes the following General Responses to FCTA's
First Request for Production of Documents.

1. BellSouth objects to the requests to the extent that
such requests seek to impose as obligation on BellSouth to
respond on behalf of subsidiaries, affiliates, or other persons
that are not parties to this case on the grounds that such
requests are overly broad, unduly burdensome, oppressive, and not
permitted by applicable discovery rules.

2. BellSouth has interpreted FCTA's requests to apply to
BellSouth's regulated intrastate operations in Florida and limits

DOCUMENT NUMBER-DATE

10016 SEP 19 96

FPSC-RECORDS/REPORTING

its Answers accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

4. BellSouth objects to each and every request to the extent that the information requested constitute "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that FCTA's requests request proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for FCTA pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

RESPONSES TO SPECIFIC RESPONSES

Subject to, and without waiver of, the foregoing general responses, BellSouth enters the following specific responses with respect to FCTA's requests:

5. With respect to Request No. 1, BellSouth will produce responsive documents that are in its possession, custody, or

control at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.

6. With respect to Request No. 2, BellSouth objects to the extent the request seeks portions of BellSouth's tariff, because applicable tariffs are on file with the Commission, are a matter of public record, and are equally available to FCTA.

Respectfully submitted this 19th day of September, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (aw)

ROBERT G. BEATTY
J. PHILLIP CARVER
c/o Nancy Sims
150 South Monroe Street, #400
Tallahassee, Florida 32301
(305) 347-5555

William J. Ellenberg II (aw)

WILLIAM J. ELLENBERG II
NANCY B. WHITE
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404) 335-0710

CERTIFICATE OF SERVICE

Docket No. 920260-TL

Docket No. 900960-TL

Docket No. 910163-TL

Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 19th day of September, 1996 to:

Robin Norton
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Martha Brown
Division of Legal Services
Florida Public Svc. Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff & Reeves
117 South Gadsden Street
Tallahassee, FL 32301
atty for FIXCA

Kenneth A. Hoffman
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302
atty for FPTA

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
101 N. Monroe Street
Suite 200
Tallahassee, Florida 32301

Dan B. Hendrickson
Post Office Box 1201
Tallahassee, FL 32302
atty for FCAN

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Michael J. Henry
MCI Telecommunications Corp.
780 Johnson Ferry Road
Suite 700
Atlanta, Georgia 30342

Richard D. Melson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, Florida 32314
atty for MCI

Rick Wright
Regulatory Analyst
Division of Audit and Finance
Florida Public Svc. Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Laura L. Wilson, Esq.
Florida Cable Telecommunications
Assn., Inc.
310 North Monroe Street
Tallahassee, FL 32301
atty for FCTA

Benjamin W. Fincher
Sprint Communications Co.
Limited Partnership
3100 Cumberland Circle, #802
Atlanta, GA 30339

Benjamin H. Dickens, Jr.
Blooston, Mordkofsky,
Jackson & Dickens
2120 L Street, N.W.
Washington, DC 20037
Atty for Fla Ad Hoc

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Ervin
305 South Gadsen Street
Post Office Drawer 1170
Tallahassee, Florida 32302
atty for Sprint

Angela Green
Florida Public
Telecommunications Assn., Inc.
125 South Gadsden Street
Suite 200
Tallahassee, FL 32301

Monte Belote
Florida Consumer Action Network
4100 W. Kennedy Blvd., #128
Tampa, FL 33609

Joseph Gillan
J.P. Gillan & Associates
P.O. Box 541038
Orlando, FL 32854-1038

Mark Richard
Attorney for CWA
Locals 3121, 3122, and 3107
304 Palermo Avenue
Coral Gables, FL 33134

Marsha E. Rule
Wiggins & Villacorta P.A.
501 East Tennessee St.
Suite B
P.O. Drawer 1657
Tallahassee, FL 32302

Marilyn Lenard
Council of Florida AFL-CIO
135 S. Monroe Street
Tallahassee, FL 32301

David Larimer
P.O. Box 419000
Melbourne, FL 32941

Michael Gross
Department of Legal Affairs
The Capitol, PL-01
Tallahassee, FL 32399

Mr. Douglas S. Metcalf
Communications Consultants, Inc.
631 S. Orlando Ave., Suite 450
P. O. Box 1148
Winter Park, FL 32790-1148

Mr. Cecil O. Simpson, Jr.
Mr. Peter Q. Nyce, Jr.
Department of the Army
901 North Stuart Street, #400
Arlington, VA 22203

Mr. Michael Fannon
Cellular One
2735 Capital Circle, NE
Tallahassee, FL 32308

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman & Metz
Post Office Box 1876
Tallahassee, FL 32302-1876
Attys for McCaw Cellular

Stan Greer
Division of Communications
Florida Public Svc. Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Patricia Kurlin
Intermedia Communications Inc.
9280 Bay Plaza Boulevard, #720
Tampa, FL 33619

Susan Weinstock
Department of State Legislation
601 E. Street, NW
Washington, DC 20049

Mark Logan
201 S. Monroe Street, #500
Tallahassee, FL 32301

Dan Shorter
P.O. Box 24700
West Palm Beach, FL 33416

Robin Dunson
1200 Peachtree Street
Promenade I, Room 4038
Atlanta, GA 30309

William H. Higgins, Esq.
AT&T Wireless Services of
Florida, Inc.
250 S. Australian Avenue
W. Palm Beach, FL 33401

Nancy B. White (ms)