

NANCY B. WHITE
General Attorney

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

September 27, 1996

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

940833-TP

RE: Docket No. 96-046-TP; 96046-TP; 96046-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections and Responses to ACSI's Second Request for Production of Documents. 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
(22)

Enclosures

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

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- ICK _____
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- PP _____
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DOCUMENT NUMBER-DATE
940833-TP SEP 27 96
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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 27th 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
Tallahassee, FL 32399
(904)413-6204

Robin D. Dunson, Esq.
1200 Peachtree Street, NE
Promenade I, Room 4038
Atlanta, GA 30309
(404)810-8689

Mark A. Logan, Esq.
Brian D. Ballard, Esq.
Bryant, Miller & Olive, P.A.
201 S. Monroe Street
Tallahassee, FL 32301
(904)222-8611

Richard D. Melson, Esq.
Hopping Green Sams & Smith
123 South Calhoun Street
Tallahassee, FL 32314
(904)222-7500

Nancy B. White
(2R)

CERTIFICATE OF SERVICE
DOCKET NO. 960916-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 27th day of September, 1996 to the following:

Staff Counsel
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Floyd R. Self, Esq.
Norman H. Horton, Jr., Esq.
Messer, Caparello, Madsen,
Goldman & Metz, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32302-1876
(904) 222-0720

Brad Mutschelknaus
Kelley Drye & Warren, L.L.P.
Suite 500
1200 19th Street, N.W.
Washington, D.C. 20036

Nancy B. White
(22)

ORIGINAL
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T)	
Communications of the Southern)	
States, Inc., MCI)	Docket No. 960833-TP
Telecommunications Corporation,)	
MCI Metro Access Transmission)	
Services, Inc., American)	Docket No. 960846-TP
Communications Services, Inc.)	
and American Communications)	
Services of Jacksonville, Inc.)	Docket No. 960916-TP
for arbitration of certain terms)	
and conditions of a proposed)	
agreement with BellSouth)	
Telecommunications, Inc.)	
concerning interconnection and)	Filed: September 27, 1996
resale under the)	
Telecommunications Act of 1996)	
)	

BELLSOUTH TELECOMMUNICATIONS, INC.'S
 OBJECTIONS AND RESPONSES TO
ACSI'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

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 Objections and Responses to American Communications Services, Inc. and American Communications of Jacksonville, Inc.'s ("ACSI") Second Request for Production of Documents.

GENERAL RESPONSES AND OBJECTIONS

The objections stated herein are made at this time for the purpose of complying with the ten-day requirement set forth in the procedural orders issued by the Florida Public Service Commission ("Commission") in the above-referenced dockets.

DOCUMENT NUMBER-DATE
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1. BellSouth objects to the requests to the extent that such requests seek to impose an 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 ACSI's request to apply to BellSouth's regulated intrastate operations in Florida and will limit 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 to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each and every request insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests. Any Answers provided by BellSouth in response to

ACSI's request will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth will attempt to note each instance where this objection applies.

6. BellSouth objects to ACSI's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth which exceed the requirements of the Florida Rules of Civil Procedure or Florida Law, particularly General Instruction No. 4.

7. 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 ACSI requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for ACSI pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

8. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates

countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been provided in response to these discovery requests. Rather, these responses provide all of the information obtained by BellSouth after a reasonable and diligent search conducted in connection with this discovery request. BellSouth has complied with ACSI's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

SPECIFIC OBJECTIONS AND RESPONSES

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

9. With respect to Request No. 17, BellSouth incorporates General Objection Nos. 1 and 2. Subject to those objections, BellSouth will produce responsive documents that are in BellSouth's possession, custody, or control at a mutually convenient time and place.

10. With respect to Request No. 18, BellSouth incorporates General Objection Nos. 1 and 2. Subject to those objections, BellSouth will produce responsive documents that are in BellSouth's possession, custody, or control at a mutually convenient time and place.

11. With respect to Request No. 19, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to General Objection Nos. 1 and 2.

12. With respect to Request No. 20, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to General Objection Nos. 1 and 2.

13. With respect to Request No. 21, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to General Objection Nos. 1 and 2. BellSouth also refers ACSI to BellSouth's Response to Request No. 19.

14. With respect to Request No. 22, BellSouth refers ACSI to BellSouth Response to Request No. 21.

15. With respect to Request No. 23, BellSouth incorporates General Objection Nos. 1 and 2. Subject to these objections, BellSouth has no documents responsive to this request in its possession, custody, or control.

Respectfully submitted this 27th day of September, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty

ROBERT G. BEATTY (28)

J. PHILLIP CARVER

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305)347-5555

William J. Ellenberg, II

WILLIAM J. ELLENBERG II

NANCY B. WHITE

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404)335-0710