

NANCY B. WHITE
General Attorney

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

October 7, 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. 960658-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to Joint Complainant'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 (m)
Nancy B. White

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

Enclosures

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

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10726 OCT-7 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Florida)
Interexchange Carriers)
Association, and AT&T)
Communications of the Southern) Docket No. 960658-TP
Southern States, Inc. against)
BellSouth Telecommunications,) Filed: October 7, 1996
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE
TO JOINT COMPLAINANT'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and files pursuant to Rule 25-22.034, Florida Administrative Code, and Rules 1.280(c) and 1.350 of the Florida Rules of Civil Procedure, its Responses to Joint Complainant's Second Request for Production of Documents.

SPECIFIC RESPONSES

1. 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.
2. With respect to Request No. 2, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.
3. With respect to Request No. 3, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.
4. With respect to Request No. 4, BellSouth refers Joint Complainant's to BellSouth's Response to Joint Complainant's

First Request for Production of Documents, Bates Nos. 312-335,
384-391, 525-542, and 543-557.

Respectfully submitted this 7th day of October, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (ps)

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 (ps)

WILLIAM J. ELLENBERG II

NANCY B. WHITE

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404) 335-0710

CERTIFICATE OF SERVICE
Docket Nos. 930330-TP and 960658-TP

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail this 7TH of October, 1996 to:

Charles J. Beck
Office of Public Counsel
c/o The Florida Legislature
Suite 812
111 West Madison Street
Tallahassee, FL 32399-1440

Monica Barone, Esq.
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Cathy Swanson
Central Telephone Company
of Florida
Post Office Box 2214
Tallahassee, FL 32316

Lee L. Willis
John P. Fons
J. Jeffrey Wahlen
Macfarlane, Ausley, Ferguson
& McMullen
Post Office Box 391
Tallahassee, FL 32302

Martha McMillin
MCI Telecommunications Corp.
Suite 700
780 Johnson Ferry Road
Atlanta, GA 30342
(404) 843-6140

Richard D. Melson
Hopping Boyd Green & Sams
P.O. Box 6526
Tallahassee, FL 32314

Kimberly Caswell
GTE Florida Incorporated
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

Harriet Eudy
ALLTEL Florida, Inc.
Post Office Box 550
Live Oak, FL 32060

Michael W. Tye, Esq.
Tracy Hatch
AT&T
101 North Monroe St., Ste. 700
Tallahassee, FL 32301
(904) 425-6360
atty for AT&T

David B. Erwin
Young, van Assenderp, Varnadoe
& Benton, P.A.
225 South Adams St., Ste. 200
Post Office Box 1833
Tallahassee, FL 32302

Mr. John A. Carroll, Jr.
Northeast Florida Telephone Co.
Post Office Box 485
Macclenny, FL 32063-0485

Charles Dennis
Indiantown Telephone System
Post Office Box 277
Indiantown, FL 34956

Jeff McGehee
Southland Telephone Company
210 Brookwood Road
Post Office Box 37
Atmore, Alabama 36504

Daniel V. Gregory
Quincy Telephone Company
Post Office Box 189
Quincy, FL 32351

Deborah Barratt
Vice President
One Call Communications, Inc.
801 Congressional Boulevard
Carmel, Indiana 46032

Angela B. Green
General Counsel
Florida Public Telecommunications
Assoc.
125 So. Gadsden St., #200
Tallahassee, FL 32302

Benjamin W. Fincher
Attorney, State Regulatory
Sprint Communications Company
Limited Partnership
3100 Cumberland Circle
Atlanta, GA 30339

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Ervin
P.O. Drawer 1170
305 South Gadsden Street
Tallahassee, FL 32302
atty for Sprint

Joseph A. McGlothlin *
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin
Davidson, Rief & Bakas
117 South Gadsden Street
Tallahassee, FL 32301
Attys. for FIXCA

Robin Dunson
1200 Peachtree Street, N.E.
Suite 4038
Atlanta, GA 30309
Atty. for AT&T

Mark Logan
Bryant, Miller & Olive
201 S. Monroe Street
Suite 500
Tallahassee, FL 32301
Atty. for AT&T


J. Phillip Carver

* Hand-delivery