

NANCY B. WHITE
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Legal Department

BellSouth Telecommunications, Inc.
150 South Monroe Street
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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. [REDACTED]-TP; 960846-TP; 960916-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to Staff's Second Request for Production of Documents and Notice of Intent to Request 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 *(BW)*

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

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

^{2 parts}
This Notice of Intent was filed with Confidential Document No. 10730-96. The document has been placed in the confidential files pending receipt of a request for confidential treatment.

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
10729 OCT-7 96
FPSC-RECORDS/REPORTING

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: October 7, 1996
resale under the)
Telecommunications Act of 1996)
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE AND OBJECTIONS TO STAFF'S SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS AND NOTICE OF
INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc. ("BellSouth") files (1) pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Response and Objections to the Florida Public Service Commission Staff's ("Staff") Second Request for Production of Documents dated September 17, 1996 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 Second Request for Production of Documents contain information which is exempted from public disclosure

DOCUMENT NUMBER-DATE
10729 OCT-7 96
FPSC-RECORDS/REPORTING

pursuant to §§ 119.07 and 364.183, Florida Statutes.

Specifically, some of the documents contain, among other things, cost 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 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 this 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's 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.

SPECIFIC RESPONSE

4. With respect to Request No. 6, 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 filed herein.

5. With respect to Request No. 7, BellSouth avers that responsive documents are in Staff's possession, custody, or control.

6. With respect to Request No. 8, BellSouth avers that responsive documents are in Staff's possession, custody, or control.

7. With respect to Request No. 9, BellSouth avers that responsive documents are in Staff's possession, custody, or control.

8. With respect to Request No. 10, BellSouth avers that responsive documents are in Staff's possession, custody, or control.

9. With respect to Request No. 11, BellSouth avers that responsive documents are in Staff's possession, custody, or control.

10. With respect to Request No. 12, BellSouth avers that responsive documents are in Staff's possession, custody, or control.

11. With respect to Request No. 13, BellSouth avers that responsive documents are in Staff's possession, custody, or control.

12. With respect to Request No. 14, BellSouth avers that responsive documents are in Staff's possession, custody, or control.

13. With respect to Request No. 15, BellSouth avers that responsive documents are in Staff's possession, custody, or control.

14. With respect to Request No. 16, BellSouth avers that responsive documents are in Staff's possession, custody, or control.

15. With respect to Request No. 17, BellSouth objects to this request on the grounds that it is not relevant to BellSouth's regulated intrastate operations in Florida.

16. With respect to Request No. 18, BellSouth has no responsive documents in its possession, custody, or control.

17. With respect to Request No. 19, BellSouth has no responsive documents in its possession, custody, or control.

18. With respect to Request No. 20, BellSouth has no responsive documents in its possession, custody, or control.

19. With respect to Request No. 21, BellSouth has no responsive documents in its possession, custody, or control.

20. With respect to Request No. 22, BellSouth has no responsive documents in its possession, custody, or control.

21. With respect to Request No. 23, has no responsive documents in its possession, custody, or control.

22. With respect to Request No. 24, BellSouth has no responsive documents in its possession, custody, or control.

23. With respect to Request No. 25, BellSouth has no responsive documents in its possession, custody, or control.

24. With respect to Request No. 26, BellSouth has no responsive documents in its possession, custody, or control.

25. With respect to Request No. 27, BellSouth has no responsive documents in its possession, custody, or control.

26. With respect to Request No. 28, BellSouth has no responsive documents in its possession, custody, or control.

27. With respect to Request No. 29, BellSouth refers Staff to the exhibits attached to the testimony of Daonne Caldwell.

28. With respect to Request No. 30, BellSouth has no responsive documents in its possession, custody, or control.

29. With respect to Request No. 31, BellSouth has no responsive documents in its possession, custody, or control.

30. With respect to Request No. 32, BellSouth has no responsive documents in its possession, custody, or control.

31. With respect to Request No. 33, BellSouth has no responsive documents in its possession, custody, or control.

32. With respect to Request No. 34, BellSouth has no responsive documents in its possession, custody, or control.

33. With respect to Request No. 35, BellSouth refers Staff to the exhibits attached to the testimony of Daonne Caldwell.

34. With respect to Request No. 36, BellSouth will provide documents responsive to Florida.

35. With respect to Request No. 37, BellSouth avers that responsive documents are in Staff's possession, custody, or control.

36. With respect to Request No. 38, BellSouth avers that responsive documents are in Staff's possession, custody, or control.

37. With respect to Request No. 39, BellSouth avers that responsive documents are in Staff's possession, custody, or control.

Respectfully submitted this 7th day of October, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (PWS)

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 (PWS)

WILLIAM J. ELLENBERG II
NANCY B. WHITE

675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404)335-0710

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 7th day of October, 1996 to the following:

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

Donna Canzano
Florida Public Service
Commission
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Tallahassee, FL 32399
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(904)222-8611

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

Nancy B. White (1/1)

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 7th day of October, 1996 to the following:

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

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Washington, D.C. 20036

Nancy B. White (ms)