

ORIGINAL
FILE COPY

NANCY B. WHITE
General Attorney

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

November 22, 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. 961150-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Staff's First 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 (N)

- ACK _____
- AFA _____
- APP _____
- CAS _____
- CME Feith
- CTR _____
- EAC _____
- LED 2
- LIT 5
- OPR _____
- RCP _____
- SEC 1
- WAS _____

Enclosures

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

DOCUMENT NUMBER-DATE

12565 NOV 22 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

In re: Petition by Sprint)
Communications Company)
L.P. for Arbitration of)
Interconnection with BellSouth) Docket No.: 961150-TP
Telecommunications, Inc.)
Under the Telecommunications) Filed: November 22, 1996
Act of 1996)
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS TO
STAFF'S FIRST 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 to the Staff of the Florida Public Service Commission's ("Staff") First Request for Production of Documents.

The objections stated herein are preliminary in nature and 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. Should additional grounds for objection be discovered as BellSouth prepares its Answers to the above-referenced set of requests, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on Staff. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by Staff. BellSouth reserves the

DOCUMENT NUMBER-DATE

12565 NOV 22 96

FPSC-RECORDS/REPORTING

right to file a motion with the Commission seeking such an order at the time that it serves its Answers on Staff.

GENERAL OBJECTIONS

BellSouth makes the following General Objections to Staff's First Request for Production of Documents which will be incorporated by reference into BellSouth's specific responses when its Answers are served on Staff.

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 Staff's requests 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 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 Staff requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for Staff pursuant to an appropriate Notice of Intent to Request Confidential Classification, subject to any other general or specific objections contained herein.

5. 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 Staff'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.

OBJECTIONS TO SPECIFIC REQUESTS

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

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

7. With respect to Request No. 2, BellSouth avers that responsive documents are in Staff's possession, custody, or control. Please see the testimony and attachments to the Direct Testimony of Daonne D. Caldwell.

8. With respect to Request No. 3, BellSouth avers that responsive documents are in Staff's possession, custody, or control. Please see the testimony and attachments to Daonne D. Caldwell's Direct or Rebuttal Testimony filed in Docket Nos. 960757-TP, 960833-TP, and 960896-TP. Please also refer to BellSouth's response to Staff's Second Request for Production of Documents in Docket No. 960833-TP.

9. With respect to Request No. 4, BellSouth refers Staff to Request Nos. 2 and 3 above.

10. With respect to Request No. 5, BellSouth refers Staff to Request No. 2 above.

11. With respect to Request No. 6, BellSouth refers Staff to Request No. 3 above.

12. With respect to Request No. 7, BellSouth refers Staff to Request Nos. 2 and 3 above.

13. With respect to Request No. 8, BellSouth refers Staff to Request No. 3 above.

14. With respect to Request No. 9, BellSouth refers Staff to Request No. 2 above.

15. With respect to Request No. 10, BellSouth refers Staff to Request Nos. 2 and 3 above.

16. With respect to Request No. 11, BellSouth objects to this request on the grounds that it is not relevant to BellSouth's regulated intrastate operations in Florida.

17. With respect to Request No. 12, BellSouth objects to this request on the grounds that it is not relevant to BellSouth's regulated intrastate operations in Florida.

18. With respect to Request No. 13, BellSouth objects to this request on the grounds that it is not relevant to BellSouth's regulated intrastate operations in Florida.

Respectfully submitted this 22nd day of November, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty

ROBERT G. BEATTY (2R)

J. PHILLIP CARVER

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305)347-5555

Nancy B. White

WILLIAM J. ELLENBERG II (2R)

NANCY B. WHITE

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404)335-0710

CERTIFICATE OF SERVICE
DOCKET NO. 961150-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 22nd day of November, 1996 to the following:

Benjamin W. Fincher
3100 Cumberland Circle, #802
Atlanta, Georgia 30339
(404) 649-5144

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

C. Everett Boyd, Jr.
ERVIN, VARN, JACOBS & ERVIN
305 South Gadsden Street
P.O. Drawer 1170 (32302)
Tallahassee, FL 32301
(904) 224-9135

Nancy B. White
(22)