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January 24, 1997

VIA OVERNIGHT DELIVERY

Blanca S. Bayo
Director, Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 961346-TP

Dear Ms. Bayo:

Enclosed please find an original and fifteen (15) copies of Telenet of South Florida, Inc.'s First Set of Data Requests (Nos. 1 through 3) to BellSouth Telecommunications, Inc., in the above-captioned proceeding. Copies will be served to the parties shown on the attached Certificate of Service.

Please date-stamp the enclosed extra copy of these filings and return them in the self-addressed, stamped envelope.

Very truly yours,




Douglas G. Bonner
Colin Alberts

Counsel for Telenet of South Florida, Inc.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPD _____
- RCH _____
- SEC _____
- WAS _____
- C _____

Enclosures

cc: Mitch Kupinsky (Telenet)
Charlie Pellegrini (Commission)
Phillip Carver (BellSouth)

RECEIVED & FILED


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DOCUMENT DATED
01053 JAN 27 1997
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**CERTIFICATE OF SERVICE
DOCKET NO. 961346-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 24th day of January, 1997 to the following:

J. Phillip Carver
BellSouth Telecommunications, Inc.
Suite 400
150 So. Monroe Street
Tallahassee, Florida 32301

Charlie Pellegrini
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850



Colin Alberts

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Resolution of Petition(s) to Establish Right)
of Access of Telenet of South Florida, Inc.) Docket No. 961346-TP
to Call Forwarding Lines Offered by BellSouth)
Telecommunications, Inc., and for Arbitration)

**TELENET OF SOUTH FLORIDA INC.'S FIRST SET OF DATA REQUESTS
(NOS. 1 THROUGH 3) TO BELLSOUTH TELECOMMUNICATIONS, INC.**

INSTRUCTIONS

1. Each Data Request should be answered separately in writing. Each response should contain the question being answered. As to each separate answer, identify the person principally supplying the information in the answer.
2. All responses to these Data Requests should be amended when the respondent obtains information upon which (i) the respondent knows the response was incorrect when made, or (ii) the respondent knows the response was correct when made but is no longer accurate. Any amendments should be forwarded to Telenet of South Florida, Inc. ("Telenet") as soon as possible after the requirement for amendment is discovered. These Data Requests are deemed to be continuing in nature and require updated responses if the respondent learns of or obtain pertinent facts or documents now in the respondent's possession.
3. In the event there is an objection to any Data Request, each such objection should be set out in full and with specificity in writing.
4. If any document requested by these Data Requests is withheld, please identify each such document and the reasons for withholding the document.
5. These Data Requests seek information or documents within the possession, custody or control of the entity to which these Data Requests are addressed, as well as each of its predecessors, successors, divisions, parents, subsidiaries, and affiliates, each other person directly or indirectly, wholly or in part, owned or controlled by it, each partnership to which any of them is a party, and all present and former directors, officers, employees, agents, consultants or other persons acting for or on behalf of any of them.

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6. Unless otherwise specified, references to "BellSouth Telecommunications, Inc." or "BellSouth" in these data requests are references to, and seek information or documents in the possession, custody or control of, BellSouth Telecommunications, Inc., the affiliated, parent and subsidiary corporations of this entity, and the employees, directors, and agents of, and consultants to, all of the foregoing entities.

DEFINITIONS

1. The term "document" is used in its broadest sense to mean all writings and records of every type, in your possession, control or your custody, or in the hands of your agent(s) or consultant(s), including but not limited to memoranda, correspondence, notices, confirmations, reports, studies, contracts, work papers, calendars, minutes, notes, diaries, letters, log sheet, transcripts, microfilm, tapes, inputs, outputs and printouts, mechanical and electrical recordings, telephone and telegraphic communications, speeches, and all other written or electronically, mechanically or otherwise recorded information. "Document" shall also mean copies of documents, notwithstanding that the originals thereof are not in your possession, custody or control, and all attachments to any document. "Document" shall also include all writings marked "Draft," "Preliminary" or with any other term designating the document or the information contained in the document as non-final or subject to change or alteration.
2. "Person" means any individual, partnership, firm, association, corporation, or other legal business entity.
3. The terms "and," "or" and "and/or" shall be construed conjunctively in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
4. "Identify," when used in connection with a natural person, means to state that person's full name, present business and home address and present title and job description.
5. "Identify" or "state," when used with reference to a particular subject matter, means to state all facts that are known to you which refer to or relate to that subject matter, to specify each event, occurrence and instance which refer or relate to that subject matter and to identify all persons having knowledge of that subject matter.
6. Terms not defined in these Data Requests shall have the respective meanings ascribed to such terms in this proceeding; if no meanings are ascribed to such terms in the proceedings, such terms shall have the ordinary and usual meanings.
7. Throughout these Data Requests, words used in the singular include the plural and vice versa.

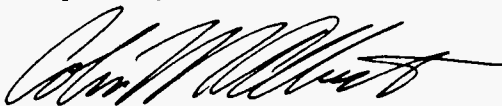
DATA REQUESTS

1. Does BellSouth Telecommunications, Inc. ("BellSouth") have in its possession or control any scientific or engineering studies or surveys conducted by BellSouth or any of its affiliates of the traffic impact upon the BellSouth portion of the public switched telephone network ("PSTN") in the State of Florida of the use of Call Forwarding services by Telenet of South Florida ("Telenet")? Does BellSouth have in its possession or control any traffic impact study or survey conducted by BellSouth or any of its affiliates which considers the impact of the use of Call Forwarding services by the public at large upon the PSTN in the state of Florida or any portion thereof? Please provide all reports and documents pertaining to these studies or surveys.

2. Does BellSouth have in its possession or control any reports that have been created by or for BellSouth or any of its affiliates that determine the total amount of revenue received by BellSouth in each of the last three years from intraLATA toll charges levied upon BellSouth customers in the South Florida LATA? Please provide all documents pertaining to these reports.

3. Does BellSouth have in its possession or control any reports that have been created by or for BellSouth or any of its affiliates that determine the total forward-looking economic costs incurred by BellSouth in each of the last three years in providing non-flat-rated, toll intraLATA telephone service to BellSouth customers in the South Florida LATA? Please provide all documents pertaining to these reports.

Respectfully submitted,



Douglas G. Bonner (Fla. Bar No. 376825)

Colin M. Alberts

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Counsel for Telenet of South Florida, Inc.

Dated: January 24, 1997